

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL , DEFENDANTS

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

1. All statements, memoranda, notes or writings, e-mails of any and all witnesses and parties you represent including any and all statements, memoranda, writings of defendants from October 6, 2010 to present .
2. All photographs, recordings, video, taken or prepared at Citizens bank park October 6, 2010, or by any defendant from October 6, 2010 to present.
3. Any and all documents containing the home and business addresses of all individuals contacted as potential witnesses.
4. All bills, receipts, diagnoses or prognoses and records for any and all medical, physical, psychiatric and/or psychological treatment by any doctor, hospital, psychologist, pharmacy, or medical facility for any injury, damage or treatment , including psych evals received by any defendant employee of Philadelphia you represent in the last ten years .
5. All medical records, employer's statements, police personnel files, employment records, military history including any Internal Affairs complaints or grievances against any defendant police officer , Internal Affairs investigator , bench warrant officer , or Riverside officer for any misconduct, any suspensions from work or any other disciplinary actions taken against the officers in the last ten years.
6. Reports of any and all experts who will testify at trial.
7. Any and all press releases in the possession of counsel for defendants.
8. Any and all Income tax returns filed by defendants and/or in his/her /their behalf within the three years immediately prior to October 6, 2010 up to and including the present.

9. Copy of every gun ownership certification or registration for every firearm kept in each defendant officers residence during the past ten years.
10. Information concerning superior's knowledge of all defendant officers alleged past violations and misconduct and what action, if any, was taken.
11. Any and all materials including emails, correspondence, related to the state district attorney's investigation of arrest and Plaintiff's Public corruption unit complaint of July 6, 2012, should be produced.
12. Plaintiff's fingerprint card taken at 1st Police district Philadelphia on October 6, 2010.
13. Any and all materials and files requested by Plaintiff in the Right-To-Know requests to Philadelphia police department.
14. Letter of transmittal of Plaintiff's Internal Affairs complaint of Officers Kelewischky, Bee, Kovacs, Ortiz with precise date of transmission to Philadelphia District Attorney's office, as protocol on back of IA complaint form requires, and copy of Plaintiff's Internal Affairs complaint with attachments, (including Plaintiff's Permanent Protection From Abuse Order from her estranged spouse).
15. Any and all written communications, including emails and facsimiles, between employees of the Philadelphia District attorney and the police, (including any response from then Commissioner Ramsay to Plaintiff's letter to him in July 2012), Plaintiff's defense attorneys or Court personnel about Plaintiff of prohibited ex parte nature from October 6, 2010 to present.
16. Any and all materials in Philadelphia police file which are Brady exculpatory and have not yet been disclosed to Plaintiff, including the precise date, reasons and circumstances surrounding the promotion of John Evans to Internal Affairs and the date he was reassigned to investigation of Plaintiff's IA complaint after her complaint had already been deemed valid and founded by a Lieutenant and another Sergeant.

8/15/16

John F. Go, Esq.
at Jody McGo

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

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VS.

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CIVIL ACTION

JOE OTERI, ET AL, DEFENDANTS

JURY TRIAL DEMANDED

TO; AARON SHOTLAND, ESQ., ATTORNEY FOR DEFENDANTS
1515 ARCH ST., PHILADELPHIA, PA 19103

Defendants, and each of them, are requested to file with this court and serve upon the undersigned counsel for plaintiff, within the time and in the manner provided by the federal rules, sworn answers to each of the following interrogatories:

I

List the names, present addresses, places of employment, and job titles of each of the following persons:

1. All witnesses known to defendants who saw plaintiff at the time of plaintiff's arrest;
2. All persons who participated in the arrest of plaintiff;
3. All witnesses known to defendant who saw plaintiff at defendant's police room at any time on October 6, 2010.
4. All witnesses who were present during the interrogation of plaintiff at defendant's premises at any time on October 6, 2010.
5. The officer who had custody of plaintiff's personal effects during the period of plaintiff's detention by police at Citizens bank park on October 6, 2010.

II

List the police badge numbers of all persons employed by defendant police department whose names have been given in answers to Interrogatory I.

III

State the time and location of plaintiff's arrest by defendant police officers on October 6, 2010, and state the names and badge numbers of the arresting officers.

IV

State the name and badge number of the person who authorized or ordered plaintiff's arrest by defendant police officers on October 6, 2010.

V

State the reasons for plaintiff's arrest on October 6, 2010, as shown by defendant police department's records.

VI

State the following facts regarding plaintiff's arrest by defendant police officers on October 6, 2010

1. Time plaintiff and arresting officers or other officers arrived at 1st precinct, names of the officers .
2. Time plaintiff and officers arrived at Jefferson Methodist Hospital Emergency Room on October 6, 2010, names of the officers.
3. Time plaintiff and officers arrived at police headquarters, names of the officers.
4. Exactly where within police headquarters building plaintiff was taken upon arrival at the headquarters building;
5. Name and badge numbers of persons who received plaintiff on arrival at police headquarters or the names and badge numbers of the persons who were in charge of the room or jail cell to which plaintiff was taken on arrival at police headquarters;
6. State what other proceedings took place at police headquarters and the names and titles of persons involved in such proceedings.

VII

State what written reports, records, or other documents, if any, relating to the arrest, detention, and release of plaintiff by defendant police department are in the possession, custody, or control of defendant police department.

VIII

If defendant police department does have possession, custody , or control of any such reports, records, fingerprints, or documents described in Interrogatory VII, state when and where the materials will be made available to plaintiff's counsel for examination and copying.

IX

State the date and time of plaintiff's release .

X

State the name and badge number of the person who released plaintiff from custody on October 7, 2010.

XI

State whether any of the following procedures took place during plaintiff's detention at defendant's police headquarters on October 7, 2010:

1. Was plaintiff fingerprinted or had she been fingerprinted at the 1st precinct?
2. Was plaintiff interrogated by defendant police officers or had she been questioned at the 1st district or at Citizens bank Park? If so, by whom?
3. Was plaintiff taken before a magistrate or trial commissioner?
4. Was plaintiff allowed to make phone calls at headquarters or at 1st precinct?
5. Did plaintiff actually make any phone calls?
6. Was plaintiff permitted to see any attorney?

XIII

Does defendant police department have a record of any previous arrest of plaintiff? If so, state when where and how records were obtained , and when and where counsel for plaintiff may have access to such records for examination and copying.

Dated:

May 9, 2016

Jo Ann Fonzone, Esquire
pro Se counsel for Plaintiff
2242 Tilghman St.
Allentown, Pa 18104

IN THE COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA
CIVIL COURT DIVISION

Pltf: JOANN FONZONE
2070 WALBERT AVE
APT B
ALLENTOWN PA 18104

1889 Redwood Dr
Whitehall, PA 18082
2842 Telford St

File No. 97-PF-61
PROTECTION FROM ABUSE

VS
Dft: CARY J WOODS

aka

fraud, David Low
David Lee Roth

D.O.B. 06-May-1957 S.S. NO. 000-00-0000

Permanent ~~Restraint Order~~
Court Order & this
a Permanent Restraining
Order against
the Defendant

2/01/03

PRELIMINARY ORDER

AND NOW, this 17TH day of JANUARY, 1997, after a Preliminary Hearing and pursuant to the Protection From Abuse Act, 23 Pa. C.S. 6101 et seq; IT IS HEREBY ORDERED THAT:

1. Defendant shall refrain from abusing, threatening, stalking, or harassing the Plaintiff and the minor child(ren) in any manner or at any location whatsoever. (or having her abused, stalked, threatened, harassed, or

2. Custody of the following minor child(ren):
- N/A
 - () a. is temporarily awarded to Plaintiff.
 - () b. is to remain as per existing custody order, No.
 - () c. is awarded to Plaintiff, temporarily superseding existing custody order, No. N/A
 - () d. is temporarily awarded to
 - () e. temporarily superseding existing custody order, No. N/A is temporarily awarded to

3. Other PFA orders:
N/A

4. Defendant is evicted/excluded from the premises at the primary residence or from any premises where the Plaintiff shall come to reside during the effective period of this order as well as from the following:

(EXCLUDE) Primary residence/police dept: S WHITEHALL TWSP
2070 WALBERT AVE APT B ALLENTOWN PA 18104

() Place of employment/police department: or anywhere she travels

() School/police department:

() Other police department:

() Exceptions to exclusion:

He has ~~been~~ bribed the attorneys who were to represent me on this PFA & connected divorce, business & legal issues who now assist him in the recurring wrongful arrests & prosecutions. As I told Judge Diefenderfer in Feb, 1998, I did not renew this because I do not want to have

He continuously bribes police & other authorities

I was told Sheriff's office Defendant

PROTECTION FROM ABUSE SERVICE INFORMATION FORM

SHERIFF'S OFFICE: (610) 820-3175 LEHI CTY RADIO: (610) 437-5252 AFTER
1. DEFENDANT INFORMATION:

A. NAME : CARY J WOODS (1. 3000 path)
B. ADDRESS : 13749 Mulholland Dr. BH CA (310) 3
2 8700 Hollywood Blvd, Los Angeles CA 90046
3 872-0642
LC ID#: 0069762
PHONE: (000) 000-
MUNCIPAL:
COUNTY:
DIRECTIONS FROM LEHIGH COUNTY COURTHOUSE:
1. NO ADDRESS FOR DEFENDANT WAS PROVIDED. HE ~~was~~ ~~is~~ RESIDING
2. IN CALIFORNIA. OR NYC ~~that he~~ ~~lives~~ with Van Halen.
3. ~~NO EMPLOY~~
C. ~~NO EMPLOY~~
CONTACT : Warner Bros. Records Sony Lewis Films
ADDRESS : 75 Rockefeller Center or 711 5th Ave.
2 NY, NY NY, NY
3
PHONE: (000) 000-0
WORK HRS: Words Entertainment
MTV Viacom
1515 Broadway, NYC
D. D.O.B.: 06-May-1957 AGE : 39
S.S.N.: 000-00-0000 RACE: White
HEIGHT: 5'10 HAIRCLR: BLOND
WEIGHT: EYES: BR
IDENTIFYING MARKS:
TATOOS: PICTURE: Y
E. VEHICLE MAKE: PORSCHE 93
COLOR: BLACK
LICENSE NO.: STATE: CA
VEHICLE MAKE: COLOR:
LICENSE NO.: STATE:

2. PLAINTIFF INFORMATION:

A. NAME : JOANN FONZONE
B. ADDRESS : 2070 WALBERT AVE
2 APT B
3 ALLENTOWN PA 18104
C. EMPLOYER: MTV - VIACOM INC.
CONTACT :
ADDRESS : 1515 Broadway, NYC, NY 10036
D. CONTACT :
ADDRESS :
E. SCHOOL :
ADDRESS :
F. D.O.B.: 19-Jul-1958
G. IS PLAINTIFF STILL LIVING WITH DFT? NO
NOTES: ID theft victim, SSN illegal use at
never ~~used~~ any money for entertainment ~~car~~
aka Andy McGrawy Pres. CEO from any corporation
MTV
PHONE: (610) 437-55
COUNTY: LEHIGH
MUNCIPAL: SOUTH WHITEH
PHONE: (000) 000-00
COUNTY:
WORK HRS:
PHONE: (000) 000-00
COUNTY:
NOTES:
PHONE: (000) 000-00
COUNTY:
SCHOOL HRS:
S.S.N.: 183-45-1688
I left California in 1994

3. IS THIS AN EVICTION? (Y/N): N

4. HEARING DATE: 23-Jan-1997 10:30 AM ROOM: 604
5. ATTY FOR PLAINTIFF: ~~John J. [unclear]~~ PHONE: 000 000 0000
6. POLICE JURISDICTION OF PLAINTIFF'S RESIDENCE: S WHITEHALL TWP PD
7. POLICE JURISDICTION OF PLAINTIFF'S CONTACT:
8. POLICE JURISDICTION OF PLAINTIFF'S EMPLOYMENT:
9. POLICE JURISDICTION OF PLAINTIFF'S SCHOOL:
10. ADDITIONAL INFORMATION:

CR: CAOSAP 1997 60

Plaintiff has been doing the legal work on these cases but ~~John~~
with ~~John~~ ~~to~~ ~~continuously~~ ~~interfere~~ with every case so that
Plaintiff is denied her constitutional
rights to due process and
a fair trial.

Legal Malpractice
Power of Attorney
Heyley
revoked 7-7-94

8. Because the Plaintiff fears what the Defendant may do in the future, Plaintiff seeks the relief prayed for hereinafter.

THEREFORE, the Plaintiff requests that this Honorable Court enter an Order providing to the Plaintiff the following relief:

- a. Directing the Defendant to refrain from stalking, abusing, threatening, or harassing the Plaintiff ^{vicious abuse, including false} ~~and the minor child(ren);~~ ^{implic} ~~or ordering such or paying for such abuse~~ ^{of no} ~~(his/her, corruption)~~ ^{crim} ^{system} ^{by his} ^{employ} ^{to} ^{an}
- b. Directing the Defendant be evicted and excluded from the premises at: 2070 WALBERT AVE APT B ALLENTOWN PA 18104 or any other residence where the Plaintiff and the minor child(ren) ~~may come to reside~~ ^{resides, place of employment or travels}
- c. Directing the Defendant to surrender the following weapon(s); ~~Professional licenses and authority to order abuse & arrest of me~~ and directing the Sheriff of Lehigh County to confiscate them;

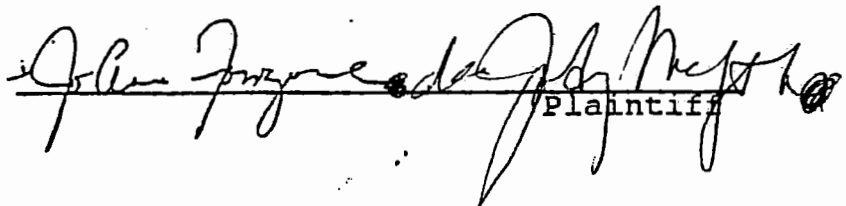
~~d. Custody of the following minor child(ren):~~

N/A

- (~~a. is temporarily awarded to Plaintiff.~~
- (~~b. is to remain as per existing custody order, No.~~
- (~~c. is awarded to Plaintiff, temporarily superseding existing custody order, No.~~ N/A
- (~~d. is temporarily awarded to~~
- (~~e. temporarily superseding existing custody order, No.~~ N/A ~~is temporarily awarded to~~

e. Directing that the Order remain in effect for a term of one year from the date of its entry;

f. Granting such other relief as your Honorable Court deems to be in the best interests of the parties.


Plaintiff

AFFIDAVIT

I verify that the statements made in this Petition are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C. S. 4904, relating to unsworn falsification to authorities.

Date: 17-Jan-1997

CK: CAOSAP 1997 60


Affiant

Internal -
Criminal Investigation Division

Memorandum of Conversation

**Location: One Bethlehem Plaza
Bethlehem, PA 18018**

August 3, 1999

Participant(s): Joan Fonzone, Witness
Francis Bedics, Special Agent
Linda Healey, Examination Agent

On the above date, Joan Fonzone, visited the IRS office in Bethlehem, PA. She contacted Special Agent Francis Bedics and asked if she could speak to him. Since Agent Bedics was the only person present in the office of the Criminal Investigation Division at the time, he asked Examination Agent Linda Healey to witness the conversation.

Ms. Fonzone ask Agent Bedics if an investigation was started on the companies she had reported to Agent Bedics approximately two years ago. Agent Bedics replied that he could not comment on any matter once it had been reported to the IRS. He told Ms. Fonzone that privacy laws disallowed him from divulging any information. Ms. Fonzone continued to tell the agents that she was being harassed by numerous law enforcement agencies because of reporting the companies and their fraudulent activities. She also stated that her telephone was wiretapped and that she was falsely arrested in March, 1999, at her residence by ~~South Whitehall police~~ ²⁰⁰⁰.

Ms. Fonzone was getting irritated as the conversation continued. It appeared that she was becoming frustrated because Agent Bedics would not disclose information to her on her original complaint. Agent Bedics told her that the original information that she came to him with two years ago was supplied to the Philadelphia Service Center via an information item. Ms. Fonzone told Agent Bedics that she wanted to retrieve her complaint from the IRS because she felt that nothing was being done and that she was being harassed and could possibly be killed if anybody found out that she made the complaint. She doesn't trust the IRS having the information. At this point, Ms. Fonzone was frustrated and left the office. *South Whitehall police for applying for a corporate case to prove I'm a victim of fraud & ID the*

I reported estranged spouse Cary Woods aka David LeRath and his attorney Alex Rahman to the IRS for illegal use of my social security number at MTV and other entertainment corporations that I have never personally received any salary or benefit from since 1981. I discovered I was a victim of identity theft and fraud in 1993.

Memorandum Page 1 of 2

I have not received any salary or benefit from any entertainment corporation ~~over~~ (direct deposit to banks in NY+LA)

*FYI - SSN - Cary Woods 107-52-1622 - 8700 Hollywood Blvd, Los Angeles, CA 90046
Alex Rahman 085-42-2563-904 Silverstone Way, Holly Springs, NC 27560*

Officer Kelewischeley

1. State your full name, badge# or ID#, present address, height, date of birth, and weight on October 6, 2010.
2. Identify all persons contributing to the answers to these interrogatories.
3. Identify and describe your occupation or employment, rank and duty assignment.
 - A. On 10/06/10 and
 - B. At the present
4. State the length of time that you have been employed and assigned.
5. How long have you been assigned at CBP for Phillies games?
7. Why was your name omitted from any police report as arresting officer?
8. When were you made aware that JoAnn Fonzone was taken to the ER by police?
9. How were you made aware that JoAnne Fonzone was taken to the ER by police?

10. What were told to you by Security Guard Oteri before he brought you to the seating section concerning JoAnn Fonzone on October 6, 2010?
11. Were you aware that Security Guard Oteri had grabbed and pushed JoAnn Fonzone into a stadium seat prior to telling you to go with him to the seating section where she was on the cement floor when you and Oteri arrived?
12. Do you deny removing JoAnn Fonzone with Oteri's assistance from the seating area and pushing her up the stairs to the concourse area?
13. Do you deny leaving the area where she was standing for 10 -15 minutes watching the game , the returning with Officer Beel and the two of you approaching her from behind, grabbing her at the elbow part of her arms and dragging here across the concourse to the police room?
14. What were you doing and why did you exit police room or what were you told and by whom during the 10 to 15 minutes from the time you left JoAnn Fonzone until you returned with Office Beel ? Did you make a pretext arrest?
15. Do you deny hearing JoAnn Fonzone yell, "What are you doing? I'm just here to watch the game!" ?
16. Do you deny saying to JoAnn Fonzone, "We just want to talk to you." As you and Officer Beel were dragging her by the heels to the police room?

IN THE UNITED STATES DISTRICT COURT
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JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO; 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Defendant, Officer Christopher Bee is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within 30 days of service of such, and in the manner provided by the federal rules sworn answers to each of the following interrogatories:

1. State your full name , present address, height , weight on Ocotober 6, 2010, date of birth.
2. How long have you been assigned to Citizen's bank Park for duty at the baseball games?
3. When and how were you made aware that Jo Ann Fonzone was taken to the ER by the police on Ocotober 6, 2010?
4. What were you doing in the police room on Ocotober 6, 2010 immediately prior to leaving the room to approach Jo Ann Fonzone from behind and assist Officer Kelewisachky as she stood in the concourse watching the game.for 10-15 minutes?

5. Do you know why and who was responsible for substituting Officer Ortiz's name on police reports for officer Kelewischky's name though she was not at the scene at the seating area and was not an arresting officer or eyewitness to anything .
6. What , when ,where exactly and by whom was probable cause to arrest Jo Ann Fonzone established, and at what time ?
7. What was Jo Ann Fonzone doing, what criminal activity was she allegedly engaging in as sufficient for probable cause as she stood in the concourse watching the game.
8. As you and officer Kelewischky had Jo Ann Fonzone's arms restrained after grabbing her from behind would it not be a factual impossibility for her to "flail her arms around or at anyone" ?
9. Is it not true that the stadium was filled to capacity at the playoff game and there were crowds of people gathered and standing at the concourse areas and entire stadium throughout the game.
10. What was the name of the police supervisor that signed to have Jo Ann Fonzone arrested , and at what time was the arrest made?

11. Where, at what time and who wrote the arrest citation and affidavit of probable cause ?
12. Why wasn't Jo Ann Fonzone ejected from the stadium if the Phillies had really determined that she should be ejected for standing and cheering exercising her 1st Amendment right for the team at the first playoff game? Were you in the police room when Sgt. Kovacs removed items from Jo Ann Fonzone's bag including her Phillies ticket.
13. As one of the two arresting officers, state what time you and officer Kelewischky placed Jo Ann Fonzone under arrest, state where you informed her that she was under arrest and what you said to her.
14. Identify and describe plaintiff Jo Ann Fonzone's oral response and actions after being advised that she was under arrest. At what time and where did you place handcuffs on Jo Ann Fonzone.
15. Describe your educational background.
16. Within the past 10 years, indicate the number of arrests you
 - a. have made
 - b. have made at Citizens bank park

- c. have assisted in
- d. have assisted in at Citizens bank park
- e. have employed the use of force
- f. have witnessed or have knowledge of officer Kelewischky's use of force

17. How many times were you named as a defendant in a lawsuit as a result of any complaints against you in your capacity as a police officer or a private person?

18. From the time you came on duty on October 6, 2010, describe your actions up to and including your first contact with the plaintiff.

19. State whether you drank any alcoholic beverages or ingested any intoxicating substances either prior to your coming on duty or at the game while on duty October 6, 2010, and if so, state for each:

a. The time when the substance was drunk or ingested;

b. The type of substance drunk or ingested ; and

c. The amount of the substance drunk or ingested.

20. State whether any complaint has been made against you in connection with the incident and the manner in which the arrest was made and detention had been effectuated, and if so, identify each and every complaint, including the name of the complainant. And how many complaints have been made against you during your employment as a police officer either with Philadelphia or any other employer?

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JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL , DEFENDANTS

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Defendant Linsette Ortiz, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal rules, 30 days from service, sworn answers to each of the following interrogatories:

1. How long and in what capacity were you employed by the Philadelphia police department and at what district were you October 6, 2010 ?
2. Isn't it true that you were the passenger in the right front seat next to Officer Eric Person in the transport vehicle when Jo Ann Fonzone was taken from Citizens bank park to the 1st District on Ocotober 6, 2010?
3. Where were you at 5:45p.m. October 6, 2010 ?

4. Why is your name on the citation for a 'site" arrest when you were not an eyewitness and not anywhere in the vicinity at the stadium seating section when Jo Ann Fonzone was being harrassed by a man in a blue shirt.
5. When , where and who told you to write and sign the citation, and who provided his version of the incident to you for the purpose of preparing the citation?
6. What is your understanding of probable cause? When where and what is the probable cause in this case? Is it okay for a civilian to determine probable cause?
7. On page78 of your telephonic testimony,you said, " I just observed her being intoxicated. " When , where and what exactly did you observe for you to reach such a conclusion without any evidence to support it.Did you see Fonzone drinking ?

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JO ANN FONZONE aka Judy Mc GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL , DEFENDANTS

NO. 5;12-CV-5726

CIVIL ACTION

JURY TRIAL DEMANDED

Defendant, John Evans, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the federal rules, 30 days from service, sworn answers to each of the following interrogatories:

1. How long and in what capacity were you employed by the Philadelphia police department?
2. When , why and by whom were you promoted to Internal Affairs of the department?
3. Where and in what capacity were you working on October 6, 2010 ?
4. Who, when, where and how were you given the Philadelphia police Discovery report to sign for the purpose of having Jo Ann Fonzone arrested Ocotober 6,2010 for summary disorderly conduct?

5. How many Internal Affairs complaints did you investigate prior to the complaint filed by Jo Ann Fonzone November 30, 2010?
6. When ,where and by whom were you assigned to investigate the IA complaint filed by Jo Ann Fonzone?
7. Why didn't you notify Jo Ann Fonzone that you had finished your IA investigation in February 2011, so that she did not have to subsequently ask for months about the report until she learned in June you had finished it , but then denied her a copy of the report.
8. Why was the hospital police report which showed that Jo Ann Fonzone was injured prior to her arrest and taken to teh Emergency Room by police hidden and wittheld for almost two years from the defense ?
9. Why were you untruthful to all 12 police officers you interviewed for the investigation that Jo Ann Fonzone had filed an Internal Affairs complaint against each and every one of them, when you were well aware that she had filed one complaint which contained the names of just 4 officers. By doing so, didnt you ensure eliciting the answers you wanted to slant the investigation .

10. How long and how well have you known Officers Bee, Kelewischky, Ortiz and Kovacs?

11. What police districts did you work at prior to being promoted to IA after you signed as supervisor on the police discovery report to have Jo Ann Fonzone arrested for disorderly conduct?

12. Why was Sargeant Middleton who was initially assigned and reviewed and determined, along with Lieutenant Appleton (who also determined that the complaint was founded and that Fonzone was a confidential informant), that Fonzone's complaint was founded or valid, suddenly removed, not allowed to continue the investigation, and then you were substituted?

13. Who and when were you assigned as substitute to continue Sargeant Middleton's investigation of Fonzone's IA complaint?

14. Why did you remove and completely neglect to question Fonzone or consider the attachments to the IA complaint including her Permanent Protection From (Vicarious) Abuse Order against her estranged spouse as possible motive for this retaliation?

15. Why did you call people totally irrelevant to this investigation while failing to interview witnesses with direct and /or personal knowledge of Jo Ann Fonzone and the incidents and /or complainant, the witnesses Fonzone provided on the IA complaint like Sergeant Addison, (who saw her bruises and had her taken to the ER), Emergency Room staff, Fonzone's family and friends ?

16. Why did you choose not to review the entire Jefferson Emergency Room report, question any of the staff who treated Jo Ann Fonzone October 6-7, 2010, question anyone other than police at the stadium or subpoena the stadium videotape, retrieve and listen to Fonzone's 911 call for help on October 6, 2010 being after she was thrown against the wall by Kelewischky? You really didn't want to do a thorough investigation into the truth of the matter, did you?

17. When did you begin and how many hours did you spend on your investigation?

18. As you did not record any interview, the summary analysis parts of your report is comprised of your words and versions of what was actually said by those you interviewed, not their actual verbatim, exact words and phrases are they?

19. Why did you refuse to give Fonzone's IA complaint with attachments to the district Attorney, though the policy, (as stated on the back of the IA complaint form) is to send them the complaint.
20. Why do you think no fans in the vicinity of the incidents at the stadium at the seating section or later in the concourse were questioned or interviewed by police at the time?
21. Why didn't you question or interview sergeant Addison or anyone at the Emergency Room about Fonzone's injuries and /or many prior injuries (which made it impossible for her to kick and swing), or severe bruising and swelling of chest, neck, and arm and shoulder, demeanor, concussion, or seizure from head trauma while in the triage area?
22. As a law enforcement officer who should know what a PFA Order is, Do you know what a battered woman with PTSD and abuse survivor looks like?
23. Why didn't you do a complete, unbiased, thorough, objective, impartial investigation of the facts and evidence in this case?
24. Isn't it true that you had a result in mind before you did any interviews, then you selected who to interview and what to ask, then swayed the officers your way and away from the truth by lying to them about the IA complaint in order to reach a false conclusion, the direct opposite conclusion and findings of the first Sergeant and Lieutenant, which were that Fonzone's complaint was valid and founded.

~~By: John J. Esquire of J. J. Esquire~~
~~John J. Esquire of J. J. Esquire~~

5/12/16

IN THE UNITED STATES DISTRICT COURT
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JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

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JOE OTERI, ET AL , DEFENDANTS

Officer Eric Person, a non-party with personal knowledge of facts surrounding the subject matter of this litigation is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the federal rules, 30 days, sworn answers to each of the following interrogatories:

1. How long have you been employed by the Philadelphia police department?
2. What police district were you with October 6, 2010 and where were you working that day?
3. Do you recall by whom, where, how, what time, and why you were called to police room at Citizens bank Park on October 6, 2010?
4. When you arrived at the police room, did you escort Jo Ann Fonzone from the stadium then drive her to the 1st district?

5. How was Jo Ann Fonzone dressed? Did she have a big canvas heavy red jacket on?

6. Did you have any close contact with her as you escorted her to the police vehicle that you could closely observe anything about her, hair color, bruises, contusions, injuries, or did her clothing cover all of her except for her face?

5

7. When and how were you made aware of the IA investigation into the incidents which occurred October 6, 2010?

8. Why do you think that the second assigned IA investigator John Evans misled or lied to you and told you that Jo Ann Fonzone made a complaint against you and Officer Ortiz.?

9. Do you know why and what crime Jo Ann Fonzone was charged with when you went to the police room to escort her to the police district?

10. Do you know why and who put your name was on the police paperwork, and in your words June 7, 2012, "the reason I got pulled into this".

11. Did Officer Ortiz put your name on her investigation paperwork as the complainant ?

12. Do you know why Officer Ortiz put your name on her report as the complainant?

13. Your name was put on the paperwork because you drove Jo Ann Fonzone to the 1st district, this was your only involvement witht the incident , and for no other reason, is that correct?

14. Do you know why officer Ortiz put your name on her investigative report as the complainant if you were not at the scene either , or in any way involved in the incident prior to driving from the stadium tot the 1st district?

15. Do you know what time you drove Jo Ann Fonzone from Citizens bank park to the 1st district?

16. Did you make any stops before arriving at the 1st district?

IN THE UNITED STATES DISTRICT COURT
- EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

NO:5;12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

Ramon Addison, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the Federal Rule, sworn answers to each of the following interrogatories:

1. How many years have you been employed with the Philadelphia police department?
2. Were you the Sargeant on duty at the 1st district on October 6, 2010, and what hours?
3. Do you remember the Plaintiff Jo Ann Fonzone who was brought to the District on Oct.6,2010 from Citizens bank park?
4. If you remember her, do you recall what time she was brought to the District by Officers Ortiz and Person?
5. Is it police procedure for the transporting officers to remain at the district after the transport?

6. Did you call the transport officers to take Jo Ann Fonzone to the hospital Emergency Room on October 6, 2010 and do you recall about what time she was transported to the ER?
7. Do you remember approximately what time you signed the police report form to have Jo Ann Fonzone transported to Jefferson ER? ✓
8. Did you sign the form prior to the transport or at a later time? If you signed it before the transport, did you then give the form to the transporting officers?
9. What is the police procedure for completing the form and when and by whom is that done?
10. If the transporting officers completed the hospital form, where do they get the information?
11. Are the transporting officers responsible for filing the police report form and where is the document filed?

12. When the injured person transported to the hospital by the police, is it police procedure to provide the individual with a copy of the VICTIM SERVICES FORM OR police report which states on the bottom:

"Pursuant to Act 185 of 1962, THE BELOW PERSON ACKNOWLEDGES RECEIPT OF THE NOTIFICATION OF VICTIM SERVICES FORM.

13. Is the police report filed at the district where the individual was transported from or where the injuries occurred ? And is the police report filed at the City Hall police records office?

14. Are the transport officers responsible for filing the police report, when , where is this hospital transport police report filed?

15. Is there any reason and are there circumstances where and why the hospital police report would not be filed at the District of Records office ,or produced, disclosed, available, or made a public record (like other police reports are)?

16. While on duty at the 1st District , do you walk around to the jail cells to see and speak with those who have been arrested?
17. Do you remember if you walked around to the jail cells October 6, 2010, and at a approximately what time that was?
18. Do you recall seeing and speaking with Jo Ann Fonzone while she was in a cell where you noticed the swelling, bruises and contusions of her hand, arm, neck,chest and telling her she needed medical attention and would be taken to the hospital?
19. Do you remember Jo Ann Fonzone telling you that she was struck on her chest by a police officer 's nightstick after calling 911 for help, and was arrested at the game because a security guard had injured her head , then brought the officer to the scene?.
20. Is it police procedure for the transporting officers to inform the individual transported to the ER about the Crime Victims Assistance program and tell her that there is a mandatory police report of the incident and this report is required in order for the injured victim to receive compensation from the Crime Vicitms Board.?

Jo Ann Fonzone, Plaintiff

Dated: May 23, 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka Judy Mc GRATH, PLAINTIFF

VS.

CIVIL ACTION
NO. 12-5726-LDD
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Officer Carol Jenkins, non-party in the above action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days, and in the manner provided by the Federal Rule, sworn answers to each of the following Interrogatories:

1. How many years have you been a police officer with the Philadelphia police department?
2. On February 21, 2011, did John Evans of Internal Affairs tell you that he was "conducting an investigation into the arrest of Jo Ann Fonzone" , not ever mentioning it was an investigation into police misconduct., as she was seriously injured while in police custody?
3. At the Internal Affairs interview with Evans, did he also tell you that Jo Ann Fonzone had filed an IA complaint against you?
4. What police district were you at on Ocotber 6, 2010 and what hours did you work?
5. At what time and by whom were you called to the 1st District to transport Jo Ann Fonzone to the hospital and what time did you arrive at the Jefferson Emergency Room?

6. Who told you that Jo Ann Fonzone had an injury to her hand but told you of no other injuries?
7. Was it you or officer Baldwin who signed Jo Ann Fonzone into the ER and spoke to the staff?
8. Is it police policy to disallow patients who they transport to the hospital from retrieving their health insurance cards from their wallets so they can provide them for their complete care, or why wasn't Jo Ann Fonzone permitted to give Jefferson hospital her Pennsylvania Highmark health insurance card which was in her wallet in her red "Support Our Troops Remember Our Veterans" bag?
9. How exactly was Jo Ann Fonzone "hostile and obnoxious" as you told John Evans, towards police at the ER? Or, didn't you actually say that?
10. On what basis did you conclude that Jo Ann Fonzone was "unhappy that they only gave her tylenol?" Or, didn't you actually say that either?
11. As matter of fact, Jo Ann Fonzone is allergic to codeine and was given a prescription for Tylenol with codeine upon discharge, though she told ER staff she was allergic to codeine, do you think that perhaps she was unhappy that they didn't listen to her, and she was in severe pain and knew she wouldn't see her primary physician until she got home and didn't know when that would be?
12. Were you in the triage area when Jo Ann Fonzone told the nurse she was the victim of physical assaults when asked how she was injured and bruised?

13. Did you fill out the hospital transport report? If so, when was that October 6 or October 7?
14. If you wrote the transport report, what did you do with the report, did you file it, and where was it filed after you transported Jo Ann Fonzone from the Jefferson ER to police headquarters at about 3:00a.m. October 7, 2010?
15. As an injured crime victim, injured prior to, (and after arrest), why wasn't Jo Ann Fonzone provided a copy of the hospital transport form to sign as acknowledgement that she received information about Crime Victims Services and a copy of the hospital police report for the purpose of obtaining Crime Victims compensation?
16. Was the District Attorney's office given a copy of the hospital transport police report form, to whom at the office, and when and how was a copy of the form forwarded to their office?

Dated" June 13, 2016

By: _____
Jo Ann Fonzone aka Judy Mc Grath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories to Officer Jenkins at the following address:

Aaron Shotland, Esq.
City of Philadelphia law department
1515 Arch St., 14th floor
Philadelphia, PA 19103

June 13, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

CIVIL ACTION
NO. 12-5726
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

John Landis, non-party, to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days, and in the manner provided by the Federal Rules, sworn answers to each of the following Interrogatories:

1. Prior to his questioning of you January 19, 2011, Did very recently promoted Internal Affairs John Evans , formerly street Sargeant John Evans, tell you that Jo Ann Fonzone had filed an Internal Affairs complaint agaisnt you?
2. You stated that you consulted with your attorney before speaking with John Evans, what is his name?
3. How many years have you been a detective with the Philadelphia police department , and how many years have you been their employee?
4. Do you know Officer Kelewischky, if so, how many years have you known him and is he a friend of yours?
5. Did you see Officer Kelewischky on October 6, 2010, and if so, where did you see him, why was his name not mentioned on report by anyone as being at Citizens bank park?

6. How many hours did you work October 6, 2010, including the overtime detail, and the week prior thereto?
7. Where exactly were you assigned and located October 6, 2010, and were you at the same precise area the entire time you were at Citizens bank park on that day, and during what hours ?
8. Did Joe Oteri give his version of events to you October 6, 2010, and did you type word for word exactly what he told you without question , hesitation, or investigation?
9. Did you also type Officer Ortiz's statement and citation for her verbatim of Oteri's version?
10. As the detective on duty, did you or any officer do any investigative work , seek Oteri's Independent CBP security report for comparison or any videotape available at that time, question any civilian witnesses at the scene in the concourse or seating area? If not, why was there no investigation done by any officer then or subsequently at the scene ?
11. What were the names of the other 2 officers in the police room sitting at the desk with you?
12. Which of the three of you answered when 911 dispatch phoned to tell you that JoAnn Fonzone had called for help from inside the adjacent police jail cell after Kelewischky threw her against the wall and she was in fear for her life?

13. Are there computers and Internet on the three desks in the police room? Did you or any officer search Google or any other info site for Jo Ann Fonzone's name at any time October 6, 2010, either prior to or after she was taken into the police room? Which officer and did that officer tell officer Bee and Kelewischky so that they left the police room to go and arrest Jo Ann Fonzone in the concourse though she was doing nothing wrong or illegal and was just standing watching the game? Did they make a pretext arrest to search her Veterans bag?
14. Who besides Officer Kelewischky was in the police room and learned that Jo Ann Fonzone had called 911 from the jail cell room? Did he express his belief that she had a camera phone before storming into the jail cell room to injure her again in attempt to retrieve her phone?
15. What police commands did Jo Ann Fonzone refuse while handcuffed and sitting in a chair in the police room prior to being thrown into the jail cell room by officer Kelewischky? Was she "unruly" while handcuffed, and how exactly was she unruly?
16. You stated to Evans that Jo Ann Fonzone was told by Sargeant Bee why she was under arrest, wha did you hear him tell her exactly as to why she had been arrested? Is this when she said that she had paid for her ticket? Do you think she meant that this was no way to treat a Phillies fan?

17. Why didnt you see Sargeant Kovacs take Jo Ann Fonzone's game ticket from her bag when he emptied the contents onto his desk and made comments about her attoreny ID card and Internal affairs card from another county? Were you out of the room or not paying attention then?
18. Do you believe it is "unruly" for a detainee to be upset and question the police as to why she ws arrested when she knows she did not break any law? Do you believe this constitutes "that kind of behavior" and that she stood out because of her age with "that behavior"?
19. Do you know the difference or similarities of a person who is under the influence and one who has suffered a head trauma and start of concussion? Did Oteri mention that he had injured Jo Ann Fonzone then he ran to get the police rather than medical help? Why do you think he failed to tell you or anyone that fact?
20. Were you in the jail cell room with Jo Ann Fonzone? Since you were not, then you cannot say definitively whether she was being thrown against the wall or struck with a stick on her chest repeatedly becasue you were not ther to observe any of this, correct?
21. Before giving your testimony on Filbert St. you had a meeting to rehearse with the asst. prosecutor Elizabeth Kotchian , is that right? Was it Kotchian who told you untruths about Fonzone including that she had 6 appointed lawyers , when the fact is that there were only two who represented her in court; the first was co-counsel then she withdrew for scheduling conflict.?

Dated: June 10, 2016

By: _____
Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I Jo Ann Fonzone, Esquire, aka Judy Mc Grath, hereby certify that I have on this day caused to be served a true and correct copy of Interrogatories to John Landis upon the following :

Aaron Shotland, Esq.
City of philadelphia law dept.
1515 Arch St., 14th floor
Phildelphia, pa 19103

June 10, 2016

By: _____
Jo Ann Fonzoen, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

CIVIL ACTION
NO. 12-5726-LDD
JURY TRIAL DEMANDED

JOE OTERI, ET AL , DEFENDANTS

Officer Kevon Baldwin, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for the Plaintiff, within the time, 30 days , and in the manner provided by the Federal Rules, sworn answers to each of the following Interrogatories;

1. While you were on duty October 6, 2010 with the Philadelphia police department, do you recall who and from what district you were called to transport Plaintiff from the 1st District to the hospital Emergency Room, and did you mention the name of that person to anyone at the time or anytime since then?
2. What time did you arrive at the 1st District for the transport to the Emergency Room, and what time did you arrive at the Jefferson ER with the patient ?
3. Did the Sargeant in charge at the 1st district give you the transport form ; had he signed the report, and what did you do with that transport report form?

4. Did you sign the patient Jo Ann Fonzone into the Emergency Room, were you asked if the patient had health insurance, and did you ask the patient for her insurance card ?

5. What did you tell the hospital staff about the patient or her injuries?

6. Were you present in the triage room with the patient Jo Ann Fonzone when she had a grand mal seizure?

7. Upon arrival at the ER, whywasnt the patient Jo Ann Fonzone allowed to retrieve her health insurance card or other ID from her bag which was in the possession of you and Officer Jenkins?

8. Was it you or Officer Jenkins who handcuffed the patient Jo Ann Fonzone to the ER bed, and at what time was that?
9. Was the patient Jo Ann Fonzone still unconscious from the seizure when she was put in handcuffs while in the hospital bed?
10. Was it you or Officer Jenkins who filled out the transport police report form, and when and where was that completed?
11. Were you aware at the time or later made aware that because the transport form mentioned only "injury to hand, prior to arrest", that the staff only treated the patient for this, rather than for the more serious injuries and trauma to her head and chest.
12. Have you transported in police custody patients to hospital emergency rooms in the past?
13. If your reply was yes to question number 12, then you must be familiar with the bottom of the transport form which allows space for a signature and states, " PURSUANT TO ACT 155 OF 1992, THE BELOW PERSON ACKNOWLEDGES RECEIPT OF THE NOTIFICATION OF VICTIM SERVICES FORM.

14. Why didnt you or Officer Jenkins give the patient Jo Ann Fonzone a copy of the transport police report or ask her to sign the bottom of it to acknowledge that she was notified about Victims Services and had recieved a copy of the police report or Victims Services form as required by the Victims compensation Assistance program in Harrisburg?

15. When and where did you or Officer Jenkins file the transport police report or turn it in?

16. If you or officer Jenkins filled out the hospital transport police report prior to transporting the patient to the ER, after she suffered a grand mal seizure in the triage area, why wasnt that fact or the head trauma at the stadium which caused the seizure prior to arrest noted on the report?

17. Why werent the bruises, contusions, and swelling of Jo Ann Fonzone's right arm, shoulder,neck and chest noted on the report?

18. Didn't you or Officer Jenkins know that she had x-rays of her hand and shoulder, didnt you see any of the bruises and contusions, do you know other areas were untreated despite the severe head trauma she sustained prior to and chest trauma after arrest, because these were not on the report?
19. Upon discharge from the ER, did you and officer Jenkins transport Jo Ann Fonzoen to police headquarters, and at what time of the next day was that?
20. Is there a DC number on the hospital police report, who assigns the number and is this report the same number as the correlating arrest citation number , is the hospital report as a matter of police policy filed with the citation of arrest at the same police district ?
21. Why was the date of occurrence of 10-07-10 written on the left side of the hospital transport report while the date on the top line 10-06-10?

22. On the hospital transport report, either you or officer Jenkins checked the box FOUNDED YES as to the complaint by the injured crime victim Jo Ann Fonzone, so why was this particular report undisclosed, intentionally hidden and suppressed for nearly 2 years or until July 3, 2012, after the complainant Jo Ann Fonzone suffered the injuries from assault and battery, harassment, false implication by the security guard Oteri and officer Kelewisachky?
23. Did you know that this report, which either you or officer Jenkins wrote, remained undisclosed, hidden, suppressed, though Jo Ann Fonzone requested all police reports from the police and District Attorney since November 9, 2010?
24. Is it police policy for the transport officers who write up the hospital transport report not to question the injured victim, in this case, Jo Ann Fonzone about how and who caused her injuries prior to or after arrest, why didn't you or Jenkins ask the injured victim about the injuries, and put the names of Oteri and Kelewisachky on the report as offenders?
25. Were there videocameras in Jefferson Methodist ER?

By: _____
Jo Ann Fonzone, Esquire

Date: 06/04/16

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY Mc GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

NO:5-12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

Defendant Philadelphia Bench Warrant Unit, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal Rules, 30 days from the service, sworn answers to each of the following Interrogatories:

1. According to your official records, when, how and from precisely whom did you get a bench warrant for non-appearance in court on September 21, 2011, to bring Jo Ann Fonzone to the Criminal Justice Center at 1301 Filbert St. Philadelphia, in September, 2011?
2. What were you told, by whom, what government entity, and why was the Unit contacted to pick up Jo Ann Fonzone at her home address in the middle of the night September 23, 2011?
3. Is there any particular reason, or is it the policy of the BWU to typically arrive at 2:00 a.m., that the Unit arrived at that hour on September 23, 2011 to take Jo Ann Fonzone into custody for not appearing in court September 21, 2011?

4. Does the BWU keep copies of all warrants that are served?
5. Where are the copies of the bench warrants kept or filed?
6. If during the course of a BWU transport, an individual named on the warrant, the individual becomes in need of medical attention and is taken to the Emergency Room, is it the policy of the BWU and Philadelphia police department to make sure that the ER patient is discharged, rather than admitted to the hospital for appropriate treatment especially if the patient has a heart condition and the BWU is aware of the heart condition because the individual is taken to the ER for the heart condition?
7. Is the policy of the BWU officers to actually read the words on the bench warrant and follow the directions thereon exactly as stated by the Judge's Order and in accordance with the laws of Pennsylvania?
8. The bench warrant Ordered that Jo Ann Fonzone was to be taken to the CJC at 1301 Filbert St., Philadelphia; so why was she taken to Riverside correctional Facility rather than the Filbert St. Court on September 23, 2011?
9. Also on the bench warrant was the PA statute about bench warrants, PaCriminal Procedure Rule 150 (A)(1) and (5)(B), which read in effect, " when a person is arrested pursuant to a bench warrant , he or she shall be taken without unnecessary delay for a hearing on the bench warrant . (5)(B) the individual shall not to be detained without a bench warrant hearing on that bench warrant longer than than 72 hours ." Are you familiar with this law?

10. Prior to sending the BWU to pick up Jo Ann Fonzone in the middle of the night on a bench warrant for not appearing in court September 21, 2011, did anyone bother to read the court file and discover the Application for Continuance she filed (and served by certified mail September 9, 2011, signed by District Attorney 's office September 15, 2011) on the clerk and the District Attorney containing her reason for not being able to appear September 21, 2011 with the reason for the Continuance being Medical , appointment with cardiologist.? If not, is it the policy of the Philadelphia police and District Attoreny to neglect to read the court file or question anything before they send a swat like team to a person's home in the middle of the night jsut becasue they were not in court the preceding day?

11. Did anyone with law enforcement, bother to read the court file and notice that Jo Ann Fonzone retained a private criminal defense attorney, in July 2011, Robert Dixon, who was in court on September 21, 2011? If not, why not?

12. Prior to sending the BWU, did anyone from law enforcement, bother to contact Mr.Dixon as to why his client was not in court September 21,2011, and if so, he could have told them the reason as she had told him to get a continuance as she had an appointment that day with her cardiologist?If not why not, is it agaisnt the policy of law enforcement to ask questions and discover facts before they act harshlyagasint an innocent individual?

Date: June 17, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I Jo Ann Fonzone, Esquire aka Judy Mc Grath, hereby certify that I have on this day caused to be served by U.S.mail a true and correct copy of the Interrogatories to Officer Baldwin to the following :

Aaron Shotland, Esquire
City of Philadelphia law dept.
1515 Arch St., 14th floor
Philadelphia, Pa 19102

06/06/16

BY; Jo Ann Fonzone aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY Mc GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

Defendant Officer Kovacs, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal Rules, 30 days from service, sworn answers to each of the following Interrogatories:

1. How long and in what capacity were you employed by the Philadelphia police department and in what district were you on October 6, 2010?
2. Did you graduate from college and if so where and when, and have you ever had any medical or psychological training?
3. If you have never had any medical or specifically psychological training, how is it that you deem yourself qualified to make a psychiatric diagnosis, deranged, of Jo Ann Fonzone on October 6, 2010, having never met her before in your life? What is your definition of 'deranged'?

4. Or, is it untrue that on January 13, 2011 you told John Evans that Jo Ann Fonzone was deranged?
5. Were you the officer who took the call from dispatch after Jo Ann Fonzone called 911 for help from the jail cell in the police room, and did the dispatcher mention that she called for help after being hurt by the police ?
6. You told John Evans that Jo Ann Fonzone called 911 seven times , what exactly did she say all those times, and why didn't the police have or provide copies of all those calls as 911 calls are always recorded?
7. Were you seated at the desk inside the police room the entire time that Jo Ann Fonzone was in custody at Citizens bank park police room?
8. If you were seated at the desk the entire time, then it would have been impossible for you to see or know what went on in the adjacent jail cell room, isn't that right?
9. It would have been impossible for you to see officer Kelewischky throw Jo Ann Fonzone against the wall, and then again a second time, and strike her with his nightstick, after you received the call from dispatch and informed him that she had a phone on her person in the jail cell room, true?

10. You told John Evans that you consulted with your attorney before he questioned you in January 2011, is that true?

11. Did your attorney tell you to slander Jo Ann Fonzone to John Evans and tell him she was "deranged", or was that something you conjoured up all by yourself? What is the name of your attorney?

12. Are you the officer in charge of searching an arrestee's belongings and did you search Jo Ann Fonzone's red veterans bag October 6, 2010, if it wasn't you then who was it?

13. If you did search her bag, which contained among other things, her attorney ID, an Internal Affairs card from another county, and her Phillies playoff ticket. What did you do with her ticket as she watched you take it from her bag ,after making derogatory comments about her upon finding her ID and the IA card?

14. Did John Evans ask you if you threw Jo Ann Fonzone's cell phone agaisnt the wall and why do you think he asked that since she at no time accused anyone of doing that and you were not even in the jail cell room where her phone was?

15. How and by whom was Jo Ann Fonzone removed from the jail cell and by whom was she arrested and brought into the police room? What are the names of the other two officers in the police room seated at the desk with you when she was brought in?
16. Were you told why and by whom Jo Ann Fonzone was arrested, like what was she doing that constituted probable cause for an arrest, by whom and where that was determined?
17. How was Jo Ann Fonzone "hostile the entire time she was in the police room", what was she doing exactly, what does hostile mean? Were you aware that she had suffered a head injury while at her seat after being pushed by a security guard and had concussion symptoms?
18. Who and when did the transport officers arrive to transport Jo Ann Fonzone to the 1st District, and at what time was that?
19. Were you in the police room when Jo Ann Fonzone left the police room, and if so, why didn't you notice that she had bruises and swelling on her right hand, (which along with her face was the only visible part of her body as she was dressed in a heavy coat, scarf, jeans, hat)?

20. By whom, when and where was Jo Ann Fonzone's cell phone recovered, was it a camera phone?
21. Did John Evans tell you that he was investigating the arrest of Jo Ann Fonzone and not an Internal Affairs complaint when he questioned you in January 2011?
22. Why did you forget to mention that Officer kelewischky was in the police room October 6, 2010, was one of two arresting officers and the officer that took Jo Ann Fonzone to the cell room?
23. Has any arrestee ever asked you or any officer why they were brought to the police room, particularly when he or she knows she did nothing wrong or illegal to warrant being detained, or is this question that Jo Ann Fonzone asked you one you have never heard before?
24. When you told John Evans that you told Jo Ann Fonzone that "they were discussing the matter with the detective" referring to her question of why was she brought into the police room, what exactly was discussed, by whom, and who determined that she would be transported to the 1st police district and why exactly was that determined?
25. Did John Evans ever mention to you or anyone in the department that Jo Ann Fonzone has a Permanent Protection From Abuse order against her estranged spouse which is supposed to protect her from retaliations like false arrest and vicarious abuse? If not, why do you think he neglected to mention the Order?

Date: June 13, 2016

By: _____
Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone aka Judy Mc Grath, hereby certify that I have on this day caused to be served a true and correct copy of Interrogatories to Sergeant Mark Kovacs, upon the following:

Aaron Shotland, Esq.
Philadelphia law dept.
1515 Arch St., 14th floor
Philadelphia, Pa 19103

June 13, 2016

By: _____
Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

CIVIL ACTION
NO. 12-5726-LDD
JURY TRIAL DEMANDED

Joseph Oteri , as above in this action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days, and in the manner provided by the Federal Rule, sworn answers to each of the following Interrogatories:

1. How many years have you been employed as a security guard, and how many years have you been employed by the Phillies organization as a security guard?
- 2, What other employment have you had in the past ten years, including part time, after hours, paid off the books as a truck driver for a relative or close associate?
3. Under oath at 1301 Filbert St., you stated that you drove truck part time, what is the name of the trucking company and owner that employed you to drive their trucks, how many years did you drive , were you driving truck in October 2010, what were your days and hours at that time, and to what destinations did you drive truck?

4. As a prosecution witness, you stated, " First we write our standard security report of the incident on a Philadelphia police department form, a security report -an incident report, when I write up the reprot, when we go down to the police room we hand it to our main supervisor, it gets filed.My statement that was given to detective on duty that has my testimony for that day.But when asked, where the statement was that you signed , the statement or report that memorialized what role you played in the incident, what statement or anything from the unnamed hostess that triggered all of this, "Do you have one? " You replied "NO". Why is there no evidence from anyone about what alleged conduct as sufficient for you to determine probable cause , that Jo Ann Fonzone was committing a crime ?
5. While on the witness stand under oath on October 2, 2013, you stated that , you "patrol certain areas in the stadium during a Phillies game and we had to stay around in case there's any incidents in the stadium". And , "you were called in ", "the security is like the law in the ballpark." So , you patrol around the stadium like a police officer looking for incidents, is that correct? Were you delegated these police like duties by a particular officer ?
6. On January 18, and October 2, 2013 , you couldn't remember what time the game started, whether it was a day or night game, or when and what section you had been called to or what section Jo Ann Fonzone was seated in, what she was wearing, what inning it was when you initiated physical contact with Jo Ann Fonzone, (by grabbing, pushing and pulling her arm), or even names of the male police officer you brought to the scene or the female officer who signed the arrest citation but was not actually at the scene. Do you remember anything at all accurately about October 6, 2010?
7. On January 18, 2013, you stated under oath, that you , " were called to Section 107; who was it that called you , what time did you get the call, and why exactly were you called to that Section, what did the alleged caller say to you exactly about what was going on in section 107, was the caller the alleged hostess who allegedly told Jo Ann Fonzone to sit down and then allegedly told you that she told her to sit down, yet the hostess remains unnamed and unknown by you and everyone else?

8. Are you now aware that Jo Ann Fonzone was seated in Section 108 and the game began at 5:05, not 7:35, 7:05, 8:05, 4:05 as you said or guessed on October 2, 2013 and January 18, 2013?
9. What is your definition of "stare on her", "like a glaze"? Do you mean how a person might look after with the start of a concussion from a head trauma after having her head hit on the back of a stadium seat by security and they again by security and police officer while picking herself up from cement ground reaching for her bag?
10. Is your serious memory impairment and failure to recall basic facts related to a psychological or psychological problem or excessive alcohol or illicit drug use, like the arrest you had for illegal drugs? Were you drinking alcohol or under the influence of illicit drugs on October 6, 2010?
11. Isn't it true that you have been arrested at least once for illegal drug use or possession?
12. Is the stadium usually quiet at a MLB playoff game, at Citizens bank park, was it quiet October 6, 2010?
13. Did you know that WIP radio station determined that the game October 6, 2010 was the loudest ever recorded at Citizens bank park?
14. As the game was the loudest ever, wouldn't a reasonable person admit that as the crowd

noise was so loud ,that any fan in the stadium might not be able to hear someone tell them to sit; what if a fan had some hearing loss from prior concussion that in such a loud setting she actually did not hear someone tell her to sit down(as it would be the furthestest thing on her mind at a playoff game)you claim January 18, 2013, pg. 29, that, " you went to say sit down as she was the only one standing up at the stadium", do you believe that?You also said, " she was standing "and "she was sitting", pg31, so which was it?

15. You testified January 18, 2013, pg. 22 that , " I didnt see nothing when I got to the section " not in the stands" when asked about Jo Ann Fonzone's behavior in the stands, indicating that you did not see any disruptive behavior there, is that still your observation?Why then did you start grabbing at her, so she had to move to her left to escape your grasp then you pushed and pulled at her forcefully that her head was pushed into the seat in front of her causing her to fall to the cement ground?
16. You testified, " a female officer was called , but " wasn't present at the bottom" (in seating area), are you referring to Officer Ortiz, who was not with you at the seating section , is that correct, and you don't remember the name of the male officer who was with you the second time? Why was Ortiz's name substituted for the male officer kelewiscky on official reports? And isnt it true that he was one of the two arresting officers later in the concourse with officer Bee as they grabbed Fonzone by the back of the arms at elbows, restraining her arms, then dragged her across the concourse to police room?
17. Do you know what time Officer Ortiz arrived at the police room to be a passenger in the transport vehicle with driver Officer Person to take Jo Ann Fonzone from the stadium to 1st police district?
18. To your knowledge , do police officers drink alcohol when at the stadium , and were any of the officers you worked with October 6, 2010 , like Officer kelewischky, at Citizens bank park drinking alcohol or under the influence of any substance , which officers were drinking alcohol or under the influence?

19. You stated under oath " she wasn't being unruly, she was watching the game in the concourse when the police approached her, touched her, then she swung at the officer with her hands , like you're pushing somebody's arm off of you because you don't want nobody to touch you",on pg. 36, Oct.2, 2013. Isn't it a normal response for any woman who is being touched by a stranger without her consent, to shrug him off , remove his hand and grasp, and try to protect herself? This does not constitute a swing, does it?
20. You stated that you "talked to other fans in the section, people on bus who said she was annoying them," but you dont know their names or what section that was either , do you?It's possible you went to the wrong section when you began to touch and harrass the wrong person as you said you" didnt see anything ".What exactly did anyone say she was doing to annoy them,and why didnt you get their names to put on your report or what they said or any contact information for corroboration of your story?
21. During the last pitch of the 5:05 start October game, when everyone was standing at Citizens bank park,it would be dark , nighttime and any photo taken of the game's last pitch would be a night photo, wouldn't it? Therefore, the Sports Illustrated centerfold of the game, a trial exhibit, was not a photo of the last pitch as prosecutor stated becasue it was a day and not a night photo, isnt that true?
22. Why did you bring police officer Kelewsichky to the seat section after you injured Jo Ann Fonzone, (she was on the cement ground because her head was hit on the stadium seat), rather than bringing medical help? Did you know that from the traumas to her head she suffered a seizure and concussion which symptoms could resemble , in your words, "like somebody not in their right state of mind"? In your classes , were you taught the difference or similarities between detecting symptoms and diagnosis of a person intoxicated , under the influence , recovering from a cold, flu or sinus infection ,and one who has suffered a severe head injury/trauma? Do you have any medical training whatsoever?

23. What exactly did you say to Kelewischky before you and he went to Section 108 where Fonzone was on the ground trying to pick herself and her bag up after the head injury, and the two of you began to grab and pull to remove her from the seating area whereby her head was hit again?

24. Isnt it true that you never put her in the handicapped section in the concourse and she was standing watching the game behind the last row of seats without incident when approached from behind by Bee and Kelewischky ? Isnt it true that she didnt refuse police commands, but merely questioned the large male arresting officers as they grabbed her elbows and dragged her across the concourse to the police room," Hey what are you doing, you're hurting me, I'm just watching the game."You said you saw," Officer Bee handcuff Jo Ann Fonzone in the concourse before she was taken to the police room," is that still your testimony?

25. On october 2, 2013 ,pg. 23, you described stadium police room procedure, " We put her in the chair first, which we normally do with anybody we bring down there to get their ID info off them and then the detective that's on duty takes the report. Then I give my statement in and then normally they let the defendant know if they're going to be receiving a citation if it was like alcohol involved or anything like that and then they usually going out the back door." Did you tell officer Ortiz what to write on her citation for summary disorderly conduct since she was not actually at the scene to see anything for probable cause to make a site arrest, or was your statement to the detective then put on the citation verbatim and signed by Ortiz becasue you as a private citizen cannot determine probable cause? Was John Evans the detective that you gave your version of the incident to, as he signed as supervisor on the arrest. Why do you think officer Ortiz had officer Person as the complainant on her reports and then you were the complainant on another report of the same incident?

Dated: June 10, 2016

By: _____
Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone, Esquire aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories to Joe Oteri upon the following :

Robert Foster
Reger Rizzo & Darnell, LLP
2929 Arch St.
Philadelphia, Pa 19104

June 10, 2016

By: _____
Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5-12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL , DEFENDANTS

Defendant Riverside correctional facility, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal Rules, 30 days from service, sworn answers to each of the following Interrogatories:

1. Is it the policy of the city of Philadelphia law enforcement to take and keep the bench warrant at Riverside when an individual is brought to Riverside facility on a bench warrant?
2. If it is not the policy of the City of Philadelphia law enforcement to take the bench warrant from the Bench Warrant Unit upon arrival at Riverside, and keep the bench warrant, where and to whom was the bench warrant given, when taken from the BWU?
3. On September 23, 2011, when Jo Ann Fonzone was brought to RCF and her bench warrant was given to an RCF officer, what did the female officer do with the bench warrant, who did she give the bench warrant to when she took all the papers that Jo Ann Fonzone had with her upon arrival at RCF, and was told that they would be returned to her upon her release?

4. Does the warden or anyone at RCF know of the PaCrim procedure law regarding bench warrant time limitations, Rule 150 A, 1, 5, which states that "a person can be detained not longer than 72 hours on a bench warrant?" If not, why not?
5. If the warden or anyone at RCF is aware of the 72 hour bench warrant hold law, then why and upon whose authority, and for what reason was Jo Ann Fonzoen unlawfully detained at RCF for 6 days on a 3 day maximum bench warrant, from September 23 to September 28, 2011?
6. Upon whose authority did officer Fisher at the exit door at RCF stop Jo Ann Fonzone from boarding the sheriff's bus on September 26, 2011 and refuse to allow her to depart and go to 1301 Filbert St. for bench warrant court, though she was scheduled to attend bench warrant court that day, as told to her by her family and the lawyer Marc Frumer they had hired to get her released?
7. Is it the city of Philadelphia and RCF policy to deny incarcerated patients cardiac medication, to ignore her grievances about lack of required health care, denial of prescribed cardiac medications (which she brought into the facility but was taken by RCF staff when she was brought there)?

8. Does any RCF employee actually read grievances such as the several Jo Ann Fonzone put in writing about her requests to be moved to another cell because the cellmate (detoxing off of heroin) was threatening to kill her, acting violently which made it impossible for her to be safe, calm and/or sleep?

9. After the 72 hours had passed, Jo Ann Fonzone also filed grievances to the warden requesting immediate release to attend a September 27, 2011 scheduled Argument on an important ID theft civil matter in another county court, why was she illegally detained and not released until September 28, though scheduled to be released September 26, 2011? Upon whose authority was Jo Ann Fonzone detained an extra two days so that she was unable to attend the scheduled Argument on September 27, 2011?

Date: June 17, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzoen aka Judy Mc Grath, hereby certify taht I haev on this day caused to be served a true and correct copy of the Interrogatories to Philadelphia Bench Warrant Unit and another set to the Riverside Correctional facility by U.S.mail upon the following :

Aaron Shotland, Esq.
City of Philadelphia law dept.
1515 Arch St. 14th floor
Phildelphia, Pa 19103

June 17, 2016

By: _____

Jo Ann Fonzone,Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka Judy Mc Grath, PLAINTIFF

VS.

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDNATS

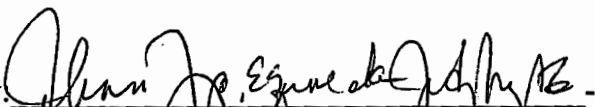
Douglas Earle, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within 30 days of service of such, and in the manner provided by the Federal Rules, sworn answers to each of the following Interrogatories:

1. Do you know the Plaintiff in this personal injury action?
2. When and where did you meet the Plaintiff Jo Ann Fonzone, and what were the circumstances, did she tell you that she was not properly represented by the defender associates and two previous private defense lawyers?
3. Did Jo Ann Fonzone sign a retainer agreement and pay your fee for your legal services in February, 2012?
4. Did you file any Motions or documents while representing Jo Ann Fonzone on a charge of disorderly conduct, if so what was that Motion and when did you file it at the CJC?

5. Was the Motion to Vacate the incompetency finding filed by you March 2, 2012 because Jo Ann Fonzone had been deemed competent and diagnosed with PTSD by two psychiatrists though the assistant district attorney David Ayers neglected to provide the presiding Judge with those reports which were in their possession since October 19, 2011, and instead kept continuing the case while deceiving the court about the facts?
6. While you were in court April 25, 2012, when Jo Ann Fonzone tried to question David Ayers about having received the report of October 19, 2011 from the former attorney Mark Frumer, did the presiding Judge have her taken out of the courtroom?
7. As a result of David Ayers misrepresenting and hiding the facts and report from the presiding Judge, was Jo Ann Fonzone compelled to have another psych eval on April 25, 2012?
8. Were you present while Jo Ann Fonzone evaluated in the basement of the courthouse on April 25, 2012?
9. Did you ask the presiding Judge to be taken off the case on April 25, 2012, two months after Jo Ann Fonzone had paid and retained you to represent her and get the charges dismissed?
10. Did the Judge allow you to quit the case and who, why and what prompted you to want to quit? Was it because Jo Ann Fonzone asked you to subpoena witnesses?

11. Isn't it true that Jo Ann Fonzone was found competent by the court psychiatrist on April 25, 2012, and at the next proceeding of May 23, 2012 the presiding Judge deemed her competent to proceed upon receipt of the second report wherein Jo Ann Fonzone was deemed competent by this second eval.?
12. At the next proceeding of June 13, 2012 in Judge Stack's courtroom, did you allow the asst.prosecutor Kotchian to continue the case because she had no witnesses in court, though Jo Ann Fonzone had two witnesses with her in the courtroom?
13. Did you leave Judge Stack's courtroom June 13, 2012 after a continuance was granted to the prosecutor, and did you hear the Judge Order, " No more contiuanes, case must be tried next proceeding or defendant is discharged and case dismissed."?
14. Did you get a letter stating that your legal services were no longer required when you left the courtroom June 13, 2012 after allowing asst.prosecutor Kotchian get yet another continuance and consequently ,during the afternoon session Jo Ann Fonzone took over her own defense, because Judge Stack appointed her June 13, 2012 after colloquy between the Judge, asst. Prosecutor Kotchian and Jo Ann Fonzone, Esq.?
15. Did you get a file from Marc Frumer in February 2012 when you were paid and retained by Jo Ann Fonzone, did Mr. Frumer speak negatively about his former client, and did the file contain a copy of her will as witnessed by three individuals?
16. When you filed and served upon the Philadelphia district attorney's office a copy of your March 2, 2012 Motion to Vacate incompetency finding, why didn't you send same to David Ayers the asst. Prosecutor on the case , rather than to Denise Spadaccini , who had no participation in this case? And why didnt you argue the Motion to vacate or any Motion to dismiss which Jo Ann Fonzone had filed ?

Date: June 22, 2016

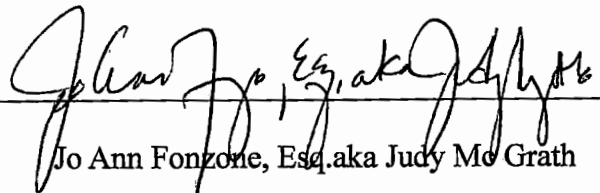
By: 
Jo Ann Fonzone, Esquire aka Judy Mc Gath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone aka Judy Mc Grath, hereby certify that I have on this day caused to be served by U.S. Mail a true and correct copy of the Interrogatories upon a non-party to this action at the following address:

Douglas Earle, Esq.
1015 Chestnut St., suite 902
Philadelphia, Pa 19107

By: _____


Jo Ann Fonzone, Esq. aka Judy Mc Grath

Date: June 23, 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka Judy Mc Grath, PLAINTIFF

vs.

NO: 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Bruce Hart, M.D. , non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff , within 30 days of service of such, and in the manner provided by the Federal rules, sworn answers to each of the following Interrogatories:

1. Were you the physician in charge in the Emergency Room at Jefferson Methodist Hospital in Philadelphia, Pa on October 6, 2010?
2. Do you remember a female patient being brought in by the police at around nine thirty p.m.?
3. What is the ER policy when an injured patient is brought in by the police, do the police sign the patient in, and what is the policy regarding insurance, is the patient asked if he has health insurance or does the City pay for the ER visit because the patient was injured while in police custody and brought in by the police?

4. Isn't it true as stated on ER discharge papers that a patient is not treated for all of his medical issues in the ER and referred to his primary physician upon discharge?
5. Is it also true that when a patient is brought to the ER by the police that the staff and the police are interested in getting the patient discharged as soon as possible, (which may limit treatment), as the police presence is a disturbance to other patients and staff?
6. Is it also true that conditions or injuries of a patient which are not immediately apparent, visible, or treated may not appear on the ER report, like a seizure in triage from a closed head injury where the chief complaint was head pain, though a concussion resulted, or a heart condition which developed from severe chest trauma as evidenced by contusions, bruises and high blood pressure, which was untreated as the visible hand and arm injuries were more apparent to staff?
7. Is it hospital policy to treat the patient for injuries which are told to staff by the police or which appear on the police report and in this case the report stated injuries were to the right hand and nothing else as the officer who wrote the report never bothered to ask Jo Ann Fonzone about her injuries?
8. Are there any videocameras in the hospital ER, if so where are they located?
9. When you order a urine test on a patient, are results included in ER report or only if there is an abnormality?

10. If a patient was intoxicated or under the influence of any illegal drugs , would you and the staff be aware of that and note it on the report? Since there was no mention and no evidence of either as Jo Ann Fonzone was not intoxicated or under the influence of any drugs, is it reasonable to conclude that she was not? Is it also reasonable to conclude she was seriously injured after being assaulted ,as noted on the report ?
11. Is it hospital policy not to report the assault crime to police , treat the patient as a crime victim or delve into the facts and circumstances surrounding the incident of assault because the victim is brought in by the police in custody ?
12. Is it true that ER staff is intimidated by police presence and will assume wrongly that the patient did something wrong because they listen to the police rather than the patient?
13. Did anyone from the police department or District Attorney's office question or interview you or any ER staff member about Jo Ann Fonzone and her visit to the ER on October 6, -7, 2010, if so, what were their names?
14. When you received subpoenas from Jo Ann Fonzone, Esquire to appear as a witness in court , why did you ignore the subpoenas and not appear, did someone tell you not to appear, and if so, who?
15. Did you not appear pursuant to subpoena because , you knew the ER records were requested by police IA investigator , and you learned that Jo Ann Fonzone had filed an IA complaint against the police officer who seriously injured her by aggravated assault , blunt chest trauma which resulted in atrial fibrillation , and did not want to be questioned ?

Date: June 25, 2016

BY: _____
Jo Ann Fonzone, Esquire

CERTIFICATE OF SERVICE

I Jo Ann Fonzone, Esquire hereby certify that I have on this day caused to be served a true and correct copy of Interrogatories to Bruce Hart, M. D. at the following address:

Bruce Hart, M.D., Emergency Medicine
Thomas Jefferson University Hospital
Methodist Hospital Division
2301 S. Broad St.
Philadelphia, Pa 19148

June 25, 2016

By: Jo Ann Fonzone, Esquire
2242 Tilghman St., Apt. 1c
Allentown, Pa 18104

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANT S

Richard Patton, Esq., defendant in the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff within the time and in the manner provided by the Federal rules, 30 days from the service, sworn answers to each of the following Interrogatories:

1. How many years have you been on the court appointed list?
2. When and by whom were you appointed to assist Jo Ann Fonzone on a summary disorderly conduct case in Phila. Court of Common Pleas?
3. At the time of your appointment were you aware that Jo Ann Fonzone was co-counsel with the prior appointed lawyer and that prior to that Jo Ann Fonzoen on August 22, 2012 had represented herself June, July august 2012 and had succesfully gotten the charges dismissed?
4. When did you first speak with asst. Prosecutor Kotchian about Jo Ann Fonzone?

5. Were you at Arraignment court for Jo Ann Fonzone July 15, 2013, and did you enter a plea?
6. Did you speak to Jo Ann Fonzone before July 15, 2013 Arraignment?
7. Was discovery closed at July 15, 2013 Arraignment, and did you notify your client about discovery closing?
8. What and when was the first contact you had with Jo Ann Fonzone?
9. Did you speak with any other lawyer about Jo Ann Fonzone prior to speaking with her?
10. If so, what are the names of those lawyers, dates and circumstances, when and where and by what mode of communication did you speak about Jo Ann Fonzone?

11. Do you remember speaking to Jo Ann Fonzone upon having to call the court appointment office several times from July to August ,finally learned that you were appointed (to help her as she had requested co-counsel to help with the subpoenaed witnesses and because her heart condition limited the number of hours she could work), and never spoke with you until September after receiving your derogatory letter September 10, 2013.?
12. Why did you send her the letter rather than returning her phone callse from July through August?
13. Do you recall sending Judge Foglietta a fax August 19, 2013 about Jo Ann Fonzone before you ever spoke with her ?
14. Why and for what valid pupose did you fax a letter to Judge Foglietta which prejudiced him against Jo Ann Fonzone before you ever spoke with her and before she ever entered his court ?
15. Did you not want the court appointment and this was your way of having Jo Ann Fonzone fire you by acting against her interests?

16. Do you recall receiving an email from Jo Ann Fonzone September 10, 2013 in reply to your certified letter of September 4, 2013?
17. Do you think it was unethical for a criminal defense lawyer to ex parte communicate with the Judge in any way such as write a defamatory letter about the client to the presiding Judge before ever having met her?
18. Do you think the letter to Judge Foglietta would have or actually did have any negative effect on Jo Ann Fonzone's case, character, reputation so as to sway the fact finder's decision in favor of the prosecution?
19. Do you frequently or is it a pattern and practice of yours to write derogatory letters to presiding judges about your clients before or at anytime you are allegedly representing us? If you were the client would you want your lawyer to write a derogatory letter to a presiding Judge about you which would guarantee a pre-determined decision against you?
20. How long have you been a member of the Pennsylvania Bar, and how many complaints have you had against you by clients?
21. Have you ever been the subject of any Disciplinary proceedings or been suspended or disbarred by any State bar for misconduct or gross violation of any Rule of Professional Responsibility or Ethical Canon?

June 27, 2016

Jo Ann Fonzone aka Judy Mc Grath

John J. Segre

2242 Tilghman St.
Allentown, PA 18104

RICHARD E. PATTON, ESQUIRE

Attorney At Law

Wednesday, September 04, 2013

VIA REGISTERED MAIL

Jo Ann Fonzone
2242 Tilghman Street / Apt 1 C
Allentown, PA 18104-4392

Re: *C/W v Fonzone/CP-51-CR-0008156-13*
Trial: 2 October 2013/CJC 508/9AM/

Dear Ms. Fonzone:

Please be informed I have received a copy of the notes of testimony from your last hearing before Judge Eubanks. Additionally I have received notification that you filed a pretrial motion. Please be advised that under the PA Rules of Criminal Procedure, and local court rules, you are not permitted to file legal motions on your behalf, unless you are representing yourself. Since you are not, your attorney is responsible for that task.

Since I am your attorney of record, I will file any motions (within reason) that you desire to file. It is my understanding that you have made the motion to represent yourself before the Court and it was denied. If I am incorrect, please advise me immediately.

Your matter has been relisted for October 2, 2013, 9AM, in Courtroom 508, Criminal Justice Center before the Honorable Judge Angelo J. Foglietta. Please be there promptly and check in with the court staff after you arrive. If you have witnesses, you want to testify on your behalf and appear, please provide me the names and addresses and telephone numbers for them immediately so I can make sure they receive their subpoenas and address any questions they may have.

Lastly, it is my further understanding that you have had a number of court appointed attorneys who have withdrawn from your case or who have asked to be removed due to reasons that do not concern me. However, I will inform you that Judge Foglietta is both fair and just in any matter I have had before him. However, I will also inform you of a caveat, the Judge does not tolerate disrespect and/or unprofessionalism or misbehavior on anyone that appears in his court. Thus, my advice to you is to permit me to do my job and represent you without interruption. If you do not, you risk the case being dismissed and/or sanctions that may involve Sheriff interaction that may not be in your best interests. Please treat this as professional advice only.

I can be reached at 215-320-7475 (Office) and, if I am not available, please leave a message and I will return your call within twenty four (24) hours of your call. Thank You.

Respectfully,

RICHARD E. PATTON, ESQUIRE

Attorney At Law

REP:ap
File

1221/23 Locust Street/Tiger Bldg 4th Floor Philadelphia, PA 19107
Ofc:(215) 320-7475/Cell: (215) 303-0914/Fax: (215) 693-1587
E-Mail Address: REP. ESQ. ONE @ COMCAST. NET



Fax

8/19/2013 9:13 AM

Honorable Angelo Foglietta
Criminal Justice Center , Room 1214
Philadelphia, PA. , 19107
Phone: 215 683-7059
Fax: 215 683-7061

OFC:

FAX:

FROM:

Law Office of
Richard Edmund Patton, Esquire

OFC: 215-320-7475/CELL:215-303-0914

E-Mail: <mailto:RICHARD@REPESQLAW.NET>
FAX: 215-598-0556

RE: C/W v Fonzona/CP/51-CR-0008156-13

PRIVACY & CONFIDENTIALITY NOTICE

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<mailto:RICHARD@REPESQLAW.NET> As required by United States Treasury Regulations, you should be aware that this communication is not intended by the sender to be used, and it cannot be used, for the purpose of avoiding penalties under the United States federal tax laws.

1221/23 Locust Street, Philadelphia, PA 19107

-----Original Message-----

From: jo76erjo <jo76erjo@aol.com>

To: REP.ESQ.ONE <REP.ESQ.ONE@COMCAST.NET>

Sent: Tue, Sep 10, 2013 4:47 pm

Mr. Patton, I called you today, 09/10/13 upon receipt of your certified letter of 09/04/13 As I was, for the fifth time since October 6, 2010, in the hospital for injuries and residual serious medical problems as a result of being an innocent victim of aggravated assault, battery, false implication, false arrest, stalking, harrasment, etc. As I mentioned in the phone conversation, I will correct the inaccuracies appearing in your letter. First, J. Eubanks is a municipal judge. That transcript is from January 2013. I am well beyond that now as I am in Common Pleas court. Secondly, I have filed many motions, starting with the Motion to Dismiss of November 9, 2010 in this case because I was not effectively represented by other lawyers. Thirdly, I had one court appointed attorney prior to you being appointed while I was not in the courtroom. Her name is Marni Snyder and we were co-counsel on January 18, 2013. She, unlike the 3 private attorneys who were paid unearned fees, was effective. Had we met sooner than 5 minutes prior to trial, and had other witnesses present, I am sure that even the summary disorderly would have been dismissed. Ms. Snyder was not able to be present at the next proceeding, so the Judge appointed another attorney at my request for the appeal which was filed Feb. 11, 2013. Beverly Marlow withdrew before we met as she had some medical problems. I requested help as I HAVE A HEART CONDITION AS A RESULT OF BLUNT FORCE TRAUMA BY THE POLICE AND I did not want to have to subpoena all the witnesses and Ms Snyder was going to get the fingerprint evidence for me and also knows Kim Gray who was to be subpoenaed as a witness as she knows I was the victim. Fourth, I was appointed By Judge Stack June 13, 2012, after colloquy where Kotchian was a party to, to represent myself, followed by Judge O'Neal, Kosinsinki in Muni. then Judge Minehart also said I could represent myself and I did have a Motion to Vacate to argue June 24, 2013, however chose to go to trial because I have a 911 audio to introduce which the Judge would not allow during the Motion hearing. For the record, June 24 was not a prelim as I have not had a prelim at anytime since this malicious prosecution began. PTSD does not make a person incompetent; perhaps you should spread that truth around Philadelphia court.

DO NOT THINK THAT YOU CAN SCOLD ME ABOUT COURTROOM ETIQUETTE. I AM THE ONE WHO HAS BEEN UNFAIRLY TREATED AND DISRESPECTED THROUGHOUT THIS MISERABLE EXPERIENCE AT 1301 FILBERT SINCE THE BEGINNING. I AM PENALIZED FOR TRYING TO AND SPEAKING THE TRUTH WHEN I GET A CHANCE TO SPEAK. I WAS WRONGLY DRAGGED THRU THE MENTAL HEALTH SYSTEM BECAUSE I TOLD JUDGE PEW ON JULY 18, 2011 THAT I HAD HIRED A PRIVATE ATTORNEY BECAUSE THE DEFENDERS WERE NOT REPRESENTING ME PROPERLY. THEN THE DA LIED TO THE JUDGE AND DID NOT GIVE THE MEDICAL REPORTS TO JUDGE NEUFIELD UNTIL 8 MONTHS AFTER THE PSYCH DIAGNOSED ME WITH PTSD AND THAT I WAS PERFECTLY COMPETENT TO PROCEED.

I got the the case dismissed August 22, 2012 on 1013. The DA appealed in September and I was not notified until November when I tried to file the Expungement petition. Ever hear of prosecutorial misconduct and bad faith? there were 3 proceedings in court from September thru November and I was not there. Kotchian knew I was representing myself then and intentionally did not serve me with the appeal papers. If you read anything that I filed rather than listen to the slander from litigation enemies, you might understand what is going on. thanks for the consideration ignoring all of my previous calls and making an effort to tell me that they got a continuance August 19. I don't live in Philadelphia and 3 years of many trips to Filbert St. is financially burdensome and hazardous to my health. PS the security guard that perjured on the stand has drug arrests. he didn't know what time the game started or what section I was seated in, yeah his credibility should be attacked.

jo76erjo@aol.com



1801 Tilghman Street • Allentown, PA 18104
Phone 484-223-3311 • Fax 484-223-3314

If you do not receive all pages call: 484-223-3311
If calling from overseas, please dial: 01-484-223-3311

FAX COVER SHEET

Date: 6/28/16 Fax #: 215-683-7061
693-1587
215-598-0556

To: Richard Patton

From: JoAnn Fonzone

Message: These are deemed served upon transmissio
as a copy sent by U.S. mail was returned

of Pages being Faxed: 5
(including cover sheet)

215-320-7475

215-303-0914

Daniel Rodriguez

From: Daniel Rodriguez <allentown-design@minutemanpress.com>
Sent: Wednesday, June 29, 2016 11:30 AM
To: 'richard@repesolaw.net'
Subject: Important!
Attachments: 20160629102652.pdf

I served Interrogatories Docket ^{US District Court} 12 CV - 5726 on June 29, 2016 to Richard E. Patton at the above e-mail address as they were previously refused when mailed to his office address in Philadelphia.

Daniel Rodriguez

Witnessed:

Glenn Fy, Esquire

6/29/16

-----Original Message-----

From: jo76erjo <jo76erjo@aol.com>
 To: REP.ESQ.ONE <REP.ESQ.ONE@COMCAST.NET>
 Sent: Tue, Sep 10, 2013 4:47 pm

Mr. Patton, I called you today, 09/10/13 upon receipt of your certified letter of 09/04/13 As I was, for the fifth time since October 6, 2010, in the hospital for injuries and residual serious medical problems as a result of being an innocent victim of aggravated assault, battery, false implication, false arrest, stalking, harrasment, etc. As I mentioned in the phone conversation, I will correct the inaccuracies appearing in your letter. First, J. Eubanks is a municipal judge. That transcript is from January 2013. I am well beyond that now as I am in Common Pleas court. Secondly, I have filed many motions, starting with the Motion to Dismiss of November 9, 2010 in this case because I was not effectively represented by other lawyers. Thirdly, I had one court appointed attorney prior to you being appointed while I was not in the courtroom. Her name is Marni Snyder and we were co-counsel on January 18, 2013. She, unlike the 3 private attorneys who were paid unearned fees, was effective. Had we met sooner than 5 minutes prior to trial, and had other witnesses present, I am sure that even the summary disorderly would have been dismissed. Ms. Snyder was not able to be present at the next proceeding, so the Judge appointed another attorney at my request for the appeal which was filed Feb. 11, 2013. Beverly Marlow withdrew before we met as she had some medical problems. I requested help as I HAVE A HEART CONDITION AS A RESULT OF BLUNT FORCE TRAUMA BY THE POLICE AND I did not want to have to subpoena all the witnesses and Ms. Snyder was going to get the fingerprint evidence for me and also knows Kim Gray who was to be subpoenaed as a witness as she knows I was the victim. Fourth, I was appointed by Judge Stack June 13, 2012, after colloquy where Kotchian was a party to, to represent myself, followed by Judge O'Neal, Kosinsinki in Muni. then Judge Minehart also said I could represent myself and I did have a Motion to Vacate to argue June 24, 2013, however chose to go to trial because I have a 911 audio to introduce which the Judge would not allow during the Motion hearing. For the record, June 24 was not a prelim as I have not had a prelim at anytime since this malicious prosecution began. PTSD does not make a person incompetent; perhaps you should spread that truth around Philadelphia court.

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jo76erjo@aol.com

#17

RICHARD E. PATTON, ESQUIRE

Attorney At Law

19 August 2013

Honorable Angelo Foglietta
Criminal Justice Center, Room 1214
Philadelphia, PA., 19107
Phone: 215 683-7059
Fax: 215 683-7061

RE: Commonwealth v Fonzone
CP-51-CR-0008156-13
Trial Date: 19 August 2013 /CJC 508

Dear Judge Foglietta:

I wanted to make sure the Court was aware of the above referenced matter and the scheduling of it. I was contacted by Court Administration last week re-scheduling the matter for a September date. Additionally, the prosecution (ADA Elisabeth Kotchian) also faxed me notification of not being ready to proceed and requested a continuance. I informed both parties had no opposition to a continuance. I made other arrangements for today, which was to appear in New York city to meet a client. However, the defendant in this matter, which I later found out this weekend, objected to the continuance and proceed to cause havoc with the Administration and others involved. This has been a problem with her and her disposition since her last court scheduling and two (2) prior court appointed attorneys having been replaced.

I wanted to place the court on notice of this problem since Ms Fonzone claims that she is an attorney and has demonstrated herself as such. It is my further understanding that she now desires to terminate my services and move on to another attorney. I am the third (3rd) attorney appointed in this matter; however, I am not asking to be removed, since I believe this case will see finality at its next listing. I respectfully await a new scheduled date and will appear on behalf of the defendant.

Thank you for your understanding and consideration in this matter. I can be reached at 215-303-0914 if the court desires a further explanation of the matter.

Respectfully Yours,

Richard Edmund Patton, Esquire

Attorney At Law

REP:mb

Cc:
ADAKotchian

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTFF

VS.

JOE OTERI, ET AL, DEFENDANTS

12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

Frank Fina, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal Rules, 30 days from the service, sworn answers to each of the following Interrogatories:

1. Were you ever employed by the previous AG Linda Kelly Pennsylvania Attorney General in the Public Corruption Unit or any other capacity?
2. If so, what was your title with the State AG's office?
3. What was the term of your employ with the AG's office?
4. Where are you employed now and when did you begin your employment with the Philadelphia District Attorney?

5. While you were employed at the Pa AG office, did you receive complaints about state employees and their misconduct?
6. Was it your responsibility to investigate complaints of public corruption made by citizens of the state of Pennsylvania?
7. Do you recall getting a complaint in July 2012 with attachments from Jo Ann Fonzone, Esquire about incidents which occurred October 6, 2010, in Philadelphia, where she was seriously injured, then mistreated by government employees, including 3 assistant prosecutors for malicious prosecution, in their effort to cover-up criminal violence of a security guard and police officer?
8. Do you recall a letter you sent to Jo Ann Fonzone, Esquire October 3, 2012 where you refused to investigate or take any action on her complaint?
9. How long after October 3, 2012 were you hired by the Philadelphia District Attorney?
10. Do you recall being served with subpoenas by Jo Ann Fonzone, Esquire, to appear in criminal court to be questioned about the PCU complaint she had filed July 6, 2012?
11. Did you fail to comply and appear at 1301 Filbert St. because you were now employed at the Philadelphia District attorney's office and did not want to answer questions about the malicious prosecution of an injured crime victim by the Philadelphia sst. Prosecutors Ayers, Kotchian, Engle?

12. Do you know any of the defendant assistant prosecutors in this action, David Ayers, Elizabeth Kotchian or Greg Engle?

13. Why did you leave the state Attorney General's employ?

14. When , how and by whom were you initially approached by the Philadelphia district Attorney 's office about a position in that office, was it prior to or after July 6, 2012?

15. Who at the Philadelphia District attorney or elsewhere, if anyone, suggested that you not comply or appear at CJC pursuant to Jo Ann Fonzone's subpoena for your appearance ?

16. Do you think a subpoena to appear is a court order which one must comply ?

Date: June 27, 2016

By: _____
Jo Ann Fonzone, Esquire

CERTIFICATE OF SERVICE

I Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories upon Frank Fina at the address as set forth below:

Frank Fina, Esq.
Philadelphia District Attorney office
3 Penn Square
Philaelphia, Pa 19107

BY: _____

June 27, 2016

Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Inadvertently, Plaintiff previously served Interrogatories upon you , a non-party , to the above titled action without including the statement that the Interrogatories were actually depositions on written questions in accordance with Federal Rule 33, and must be answered like Interrogatories within 30 days of receipt .

Frank Fine

July 11, 2016

Jo Ann Fonzone , Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka Judy McGRATH, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

12-CV-5726

CIVIL ACTION

JURY TRIAL DEMANDED

Kelvin Andersen, non-party to the above titled action is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal rules, 30 days from service, sworn answers to each of the following Interrogatories:

1. Did Jo Ann Fonzone file a complaint with the Police Advisory Commission because Internal Affairs did not properly investigate her complaint of misconduct and brutality?
2. When did Jo Ann Fonzone file her complaint and when did she have a lengthy recorded interview with a member of the PAC staff, did she provide details about two separate incidents on October 6, 2010, one at around 5:45 when injured by the security guard and the second when she was in at 6:15 custody injured by officer Kelewischky?
3. Isn't it true that a PAC supervisor informed Jo Ann Fonzone that it is mandatory protocol for a police report to be written and filed after the police transport an individual to the Emergency Room, and that she was unaware of the existence of such a report prior to PAC's information?
4. What is the name of the PAC supervisor who told Jo Ann Fonzone about the existence of mandatory police transport report when an individual is taken to the hospital by police?
5. Did you tell Jo Ann Fonzone that your commission had insufficient funds and employees to investigate many of the complaints it received?

6. Did thre forms Jo Ann Fonzone submitted to PAC state that her complaint would be forwarded to the State Attorney General and the US Attorney's office for review?
7. To the best of your knowledge, information and belief, was Jo Ann Fonzone's complaint and recorded interview with supplemental documents to PAC submitted to the Philadelphia district attorney, Pa Attorney General's office and the US Attorney by your commission?
8. If so, when was that, to what law enforcement agency , and if not, why was that?
9. Did you and PAC consider Jo Ann Fonzone a confidential informant for reporting information to the police and that she had a permanent Protection From Abuse Order from her estranged spouse which includes vicarious abuse by others and false arrest?
10. How many years have you been employed with PAC and where were you employed prior to working there?

Date: June 30, 2016

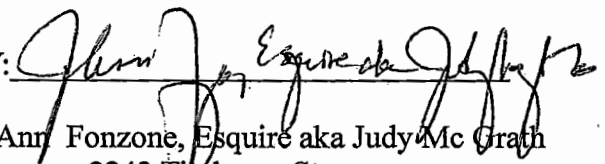
By: _____
Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone aka Judy Mc Grath, hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories upon the person at the address as set forth below:

Kelvin Andersen
City of Philadelphia Police Advisory Commission
P.O.Box 147
Philadelphia, Pa 19105-0891

Dated: June 30, 2016

BY: 
Jo Ann Fonzone, Esquire aka Judy Mc Grath
2242 Tighman St.
Allentown, Pa 18104

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
JURY TRIAL DEMANDED
CIVIL ACTION

JOE OTERI, ET AL, DEFENDANTS

Terry Melcher, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal Rules, 30 days from the service, sworn answers to each of the following Interrogatories:

1. Where are you currently employed and what is your job title?

2. Were you ever an employee of the State of Pennsylvania and if so, where, at what agency, what was your position and job title?

3..As Director of the Pennsylvania Right-To-Know Office in Harrisburg, what were your job responsibilities and how many employees did you have working for you?

4. What is the percentage of records requests were granted by government agencies upon first request , and what is the percentage of requests had to go through the record request appeal process?
5. What percentage of requestors ever got copies of records which they requested according to the Right To Know Law?
6. Was it your responsibility to read the requests made by requestors , or some of them?
7. Plaintiff Jo Ann Fonzone Esquire , has, through the years , made several requests with the Right -To -Know law, including the above titled action, and has corresponded with the RTK office, does her name sound familiar to you?
8. There are several letters signed by you to Jo Ann Fonzone, Esquire regarding RTK requests, is her name familiar to you now?

9. When , how and why did you become an employee of the law firm Pepper Hamilton LLP in Philadelphia, Pa?

10. Did you apply for a position with Pepper Hamilton or were you approached and recruited by someone, and who was that?

11. Upon your departure from employment at the Right-To-Know office , were you required to sign any non-disclosure or other type of agreement prohibiting you from discussing any records requests or appeals , taking or providing documents or information obtained at the RTK office to anyone?

12. If so, when , where and by whom was this agreement signed and witnessed, and what is the exact verbatim content of the agreement? Or, was it verbal agreement so as to avoid unfair advantage over any litigant who may have litigation where Pepper Hamilton LLP is representing the opposing parties?

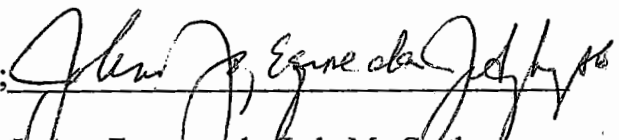
13. When you began employment at Pepper Hamilton, were you aware of the defamation lawsuit the firm was defending and that the Plaintiff was Jo Ann Fonzone?

14. If you were not aware then, when did you become aware of the defamation lawsuit?

15. Do you think that there is an actual , potential or even possible impropriety and/or conflict of interest present in this and/or the defamation action because you had knowledge and access to information about Jo Ann Fonzone's prior litigation and records requests and the reasons therefore, while the Director at the Right-To-Know office ,and now you are employed at the law firm representing the defendants in Jo Ann Fonzone's defamation action?

Date: June 30, 2016

BY:


Jo Ann Fonzone aka Judy Mc Grath
2242 Tilghman St., Allentown, PA 18104

CERTIFICATE OF SERVICE

I Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories to Terry Melcher on this date and at the address as set forth below by U.S. Mail:

Terry Melcher, Esq.
Pepper hamilton, LLP
3000 Two Logan Square
Philadelphia, Pa
19103-2799:

June 30, 2016

By: _____

Jo Ann Fonzone, Esq. Aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
JURY TRIAL DEMANDED
CIVIL ACTION

JOE OTERI, ET AL, DEFENDANTS

Terry Melcher, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal Rules, 30 days from the service, sworn answers to each of the following Interrogatories:

1. Where are you currently employed and what is your job title?

2. Were you ever an employee of the State of Pennsylvania and if so, where, at what agency, what was your position and job title?

3..As Director of the Pennsylvania Right-To-Know Office in Harrisburg, what were your job responsibilities and how many employees did you have working for you?

4. What is the percentage of records requests were granted by government agencies upon first request , and what is the percentage of requests had to go through the record request appeal process?
5. What percentage of requestors ever got copies of records which they requested according to the Right To Know Law?
6. Was it your responsibility to read the requests made by requestors , or some of them?
7. Plaintiff Jo Ann Fonzone Esquire , has, through the years , made several requests with the Right -To -Know law, including the above titled action, and has corresponded with the RTK office, does her name sound familiar to you?
8. There are several letters signed by you to Jo Ann Fonzone, Esquire regarding RTK requests, is her name familiar to you now?

9. When , how and why did you become an employee of the law firm Pepper Hamilton LLP in Philadelphia, Pa?

10. Did you apply for a position with Pepper Hamilton or were you approached and recruited by someone, and who was that?

11. Upon your departure from employment at the Right-To-Know office , were you required to sign any non-disclosure or other type of agreement prohibiting you from discussing any records requests or appeals , taking or providing documents or information obtained at the RTK office to anyone?

12. If so, when , where and by whom was this agreement signed and witnessed, and what is the exact verbatim content of the agreement? Or, was it verbal agreement so as to avoid unfair advantage over any litigant who may have litigation where Pepper Hamilton LLP is representing the opposing parties?

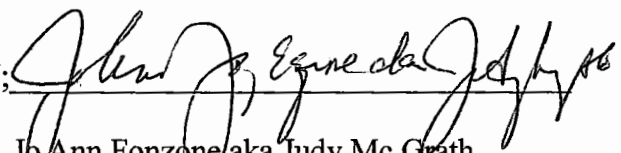
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14. If you were not aware then, when did you become aware of the defamation lawsuit?

15. Do you think that there is an actual , potential or even possible impropriety and/or conflict of interest present in this and/or the defamation action because you had knowledge and access to information about Jo Ann Fonzone's prior litigation and records requests and the reasons therefore, while the Director at the Right-To-Know office ,and now you are employed at the law firm representing the defendants in Jo Ann Fonzone's defamation action?

Date: June 30, 2016

BY:


Jo Ann Fonzone aka Judy Mc Grath
2242 Tilghman St., Allentown, PA 18104

CERTIFICATE OF SERVICE

I Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories to Terry Melcher on the date and at the address as set forth below by U.S. Mail:

Terry Melcher, Esq.
Pepper hamilton, LLP
3000 Two Logan Square
Philadelphia, Pa
19103-2799:

June 30, 2016

By: _____

Jo Ann Fonzone, Esq. Aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Marni Snyder, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within 30 days of service of such, and in the manner provided by the Federal Rules , sworn answers to each of the following Interrogatories:

1. Is it true that on December 28, 2012, you were appointed to represent Jo Ann Fonzone, who was not then present , on a disorderly conduct charge, not knowing that she had had the case dismissed with prejudice August 22, 2012 when she represented herself, or that prosecutor Kotchian appealed September 21, 2013 and had not served Fonzone with the appeal papers?
2. Is it true that you sent Jo Ann Fonzone a letter about your appointment but she did not receive the letter prior to your meeting or meet you until five minutes before trial Janaury 18, 2013?
3. Did you and Jo Ann Fonzone agree to act as co-counsel on her case?
4. As you and your co-counsel met just before trial , there was no opportunity for trial prep, interviews, to subpoena witnesses or to have witnessess testify other than co-counsel defendant Jo Ann Fonzone, is that right? Did Ms. Fonzone tell you the names of the witnesses she had subpoenaed but as prosecution kept getting continuances she did not know when the trial would actually occur?

5. Is it true that when you appeared in Judge Patrick's court January 17, 2013, after Jo Ann Fonzone had left the courtroom upon being threatened, you were unaware then, that Jo Ann Fonzone had scheduled a hearing on her private citizen complaint against Joe Oteri, the security guard who had falsely implicated her by lying to the police after he had seriously injured her at her stadium seat, and you went there to represent her on her disorderly conduct case?
6. On January 17, 2013 you were unaware that there were two cases, cases nine and ten on the calendar that day in the same room 504 with the same Judge and the same prosecutor involving Jo Ann Fonzone, one with her being the complainant and one with her the defendant?
7. Have you read the transcript of January 17, 2013, which contained some of what occurred prior to your arrival: The Court crier called cases nine and ten, Ms. Fonzone stepped up, prosecutor Engle jumped in thereby disallowing Ms. Fonzone to inform the Court that there were two separate cases scheduled. Engle abruptly said, "Respectfully, your Honor, Ms. Fonzone is represented by Marni Jo Snyder." "I have spoken with her, she is not present yet today." The judge said, "All right. It's on hold then." When Jo Ann Fonzone tried to speak and tell the court that, "I represent myself on the private citizen complaint now," she was threatened with "I'm going to call the sheriff", then exited the courtroom.
8. When you arrived at 504 that day, did you know that there were two cases, one being a private citizen complaint against security guard Joe Oteri for assault, battery, false implication, harassment, conspiracy, did prosecutor Engle tell you about that complaint and that he as the state, not you, was supposed to represent her as the complainant?
9. Do you recall Mr. Engle knowingly tell the court, "Your Honor, for both nine and ten, which are motions filed by Ms. Fonzone who is now currently represented by Ms. Snyder, Ms. Fonzone was present in court at the first call of the list, she is no longer present. I move for dismissal."

10. Do you recall then saying, based on the misrepresentations of prosecutor Engle , " Being that my client is not here , I can't oppose.", the consequence of the dismissal being that Jo Ann Fonzone crime victim was denied her private citizen complaint hearing agasint the man who had injured then falsley implicated her in the criminal system to cover up his violent assault crime resulting in injuries to Ms. Fonzone's right hand, arm, shoulder, and head truma causing seizure in the ER and concussion.
11. Do you remember upon meeting Jo Ann Fonzone and listening to her chronology telling her that you knew Kim Gray , (the defender associate who she had an hour long interview with and who had subpoenaed Ms. Fonzone's 911 audio from the police), and that you could provide an address for subpoena as she had left the Defenders office?
12. In your opinion, had the private citizen complaint hearing taken place January 17, 2013 the day prior to the Janaury 18, 2013 trial where you and Ms. Fonzone were co-counsel , and she was the defendant, do you think there would not have been a need for a trial on Janaury 18, 2013 ?
13. Though you were very effective at trial January 18, 2013, especially considering there was no time to prepare, as Ms. Fonzone was innocent , and expressed that she was the crime victim and certainly was not satisfied when prosecutor Kotchian whined and got her way (after you got the misdemeanor acquittal)with even a summary offense, had you discussed with her any post trial proceedings?
14. Ms. Fonzone filed a Motion to vacate within the 10 days on Janaury 28, 2013 as she knew you were ill and might not meet the 10 day deadline, then you also had a Motion to vacate, do you recall whether you filed the Motion or walked it into the courtroom on Janaury 29, 2013? if you went to the courtroom, do you recall wha the Judge said ?

15. Although the issue of whether Judge Eubanks did or did not vacate the summary conviction to this day remains nebulous, an appeal was filed February 11, 2013, is that true?
16. On February 12, 2013, there were several motions and two different matters before Judge Patrick, including appeal of the dismissal of her private citizen's complaint of January 17, 2013; an appeal of Patrick's dismissal or reconsideration of her 1013 dismissal from January 17, 2013; and a Motion to vacate the judgment on sentence of January 18, 2013 of Judge Eubanks; is it true that Engle objected to everything, continuously misrepresented facts to the court in order to make sure that there was never a hearing on the private citizen complaint against Oteri?
17. Ms. Fonzone's Private Citizen Appeal of Municipal court Decision on Citizen Complaint filed with Exhibits December 17, 2012 was in the court file, yet Engle, page 12 transcript Feb. 12, 2013 continuously misrepresented to Judge Patrick, "that did not occur", and therefore the Common Pleas court did not have jurisdiction. Do you recall prosecutor Engle being in denial of the court record and trying and succeeding in obtaining his objective by blatant lies to the court, just because Ms. Fonzone, on page 11, stated it was a conflict of interest for Engle and requested another ADA be assigned to the private citizen appeal, as he was to represent her as a victim on the private citizen case and was prosecuting her on the summary other case?
18. Do you recall that Judge Patrick set the next court date for March 4, and neither you or Ms. Fonzone was available that day, yet Engle kept talking about being ready for trial when there was an appellate motion to vacate to be heard on next date?
19. Do you recall asking Judge Patrick to recuse herself after she would not remove you from the case? When, how, and who removed you from the case as I stated February 12 that I wanted you to remain on the case because I was not available in March as I was getting treatment for my heart condition?
20. Do you know where did Engle false info that I had moved to Florida as he put that in a petition he filed?

21. Are you aware that I was not present or otherwise represented March 4 , 2013 or in May and could not appear until June 24, 2013 as I had been in a heart hospital and was recovering from the injury caused heart condition of Ocotber 6, 2010?

22. Are you aware that on June 24, I asked Judge Minehart if you could be reappointed as you knew the facts and the law better than any other lawyer I saw throughout this very long travesty?

23 Do you remember me coming to your office to talk to you about second appointed lawyer Richard Patton after he prejudiced Judge Foglietta against me by writing a derogatory libelous letter to him before I ever entered his court room, and telling you that I cannot get a fair trial with the Judge because of that?

24. Were you aware of a libelous newspaper article about me which caused other participants in this litigation to prejudge , treat unfairly , slander me? If so, how ,when and by whom were you made aware of the article do you know I have a defamation action pending regarding this destructive , untrue ,inaccurate, heinous, libelous , retaliatory article?

25. Are you aware that you are the only of the three appointed and three private lawyers who I have respect for as being loyal and working diligently for her client, and I want to say thank you.

By: Jo Ann Fonzone aka Judy Mc Grath

June 25, 2016

CERTIFICATE OF MAILING

I, Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have this day caused to be served a true and correct copy of non-party Interrogatories upon the following at the address as appears below:

Marni Jo Snyder, Esquire
100 S. Broad St.
Suite 1910
Philadelphia, Pa 19110

June 25, 2016

Jo Ann Fonzone, Esquire
2242 Tilghman St., 1C
Allentown, Pa 18104

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5: 12-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Robert Foster, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the Federal rules, sworn answers to each of the following Interrogatories:

1. Were you subpoenaed to appear at CJC in Judge Foglietta's courtroom on November 21, 2013?

2. By whom and when were you subpoenaed to be a witness on that day?

3. What exactly were you supposed to testify about and for whom on November 21, 2013?

4. Were you aware that at the proceeding on October 3, 2013, the next court date had been on by all parties and the court scheduled November 22, 2013, not November 21 as the
te?

5. Do you believe it was proper and ethical for you to appear at CJC to testify while knowing that Jo Ann Fonzone was the Plaintiff in an injury action where the lead defendant Joe Oteri was your client?
6. Did you speak, meet or otherwise communicate with Ms. Rainey or prosecutor Kotchian before, during or after your appearance November 21, 2013, and what was the nature, content, and frequency of those communications?
7. What was the true reason you were subpoenaed to appear November 21, 2013; to prejudice the presiding Judge against Jo Ann Fonzone and/or to attempt to gain advantage in the civil litigation?
8. Were you subpoenaed to appear November 22, 2013 then later told to appear November 21, after the date was changed, and if so, by whom?

9. Is Joe Oteri still employed by the Phillies organization, if not ,when was he fired and what were the cirmcumstances of the termination?
10. How long have you known Joe Oteri?
11. What is the name of the trucking company Joe Oteri worked for as a driver on the side while he was a Phillies employee?
12. Is the trucking company owner a realtive , associate, or syndicate acquaintance of Oteri's?
13. Did Joe Oteri get paid on or off the books by the trucking company?
14. Are you aware that Joe Oteri has been arrested on drug cahrges in the past?

15. Do you know if Joe Oteri has ever been arrested for any crimes of violence or inflicting and causing serious physical injury to individuals either while at work or anywhere in public?

16. Do you know if Joe Oteri has had any other complaints, private criminal or police complaints, or other, filed against him by other injured crime victims, while employed by the Phillies organization or anywhere else in the past?

17. What is Joe Oteri's highest level of completed education, and where was he employed before he worked for the Phillies organization?

18. Did Joe Oteri have a (possibly drug related,) memory impairment since you have represented and known him,evidenced by his inability to recall basic facts about the October 6,2010 incident ?
19. How many side bars were there November 21, 2013 with the Judge, Kotchian and Rainey while Jo Ann Fonzone was not present , and did you participate in the side bars?
20. What did you think was the reason you were subpoenaed to appear November 21, 2013?
21. Did you even consider refusing to appear and convey to the lawyer who subpoenaed you that it was improper , unethical and that you did not want to violate any Professional Rules of Responsibility as a member of the bar of Pennsylvania?
22. Did you know that Joe Oteri was delegated and performed police like duties including patrolling around the stadium, determining probable cause to arrest and giving his version to police who were not at the scene , writing up affidavits of probable cause and police reports, he acted like an agent of the state?

23. Do you believe that violent perpetrators who seriously injure innocent individuals should be protected by law enforcement in order to cover up police misconduct and attempt to avoid criminal and civil liability?

24. Are you aware that there was a truthful private citizen complaint against Joe Oteri for the incident of October 6, 2010 and the District attorney's office wrote him up for harrassment, assault and conspiracy ?

25. Did you know that Joe Oteri perjured himself January 18, 2013 and October 2, 2013?

Date: July 3, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone aka Judy Mc Grath, hereby certify that I have on this day caused to be served by U.S. Mail a true and correct copy of the Interrogatories at the address below:

Robert Foster, Esq.
Reger Rizzo & Darnell, LLP
2929 Arch St, 13 th floor
Philadelphia, Pa 19104

07/05/16

By: _____

Jo Ann Fonzoen, Esq. aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL , DEFENDANTS

NO.5;12-CV-5726
JURY TRIAL DEMANDED
CIVIL ACTION

Lance Gordon, nonparty to the above titled action is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal rules, 30 days from the service, sworn answers to each of the following Interrogatories as written depositions:

1. How many years have you been employed by the City of Philadelphia, and what is your position and job description?
2. Where is your office located?
3. Do you recall Jo Ann Fonzone entering your office for information and speaking with her November 9, 2010?
4. Do you recall her telling you about an incident at Citizens bank Park a month prior at a Phillies playoff game where she had a head injury ,concussion, and injuries to her right hand, and shoulder as she was injured by a security guard who implicated her , then charged with disorderly conduct for cheering at a playoff game and later injured by a police officer and consequentially has a heart condition and other injuries ?
5. Do you recall any information which you provided her during your conversation, including informing the Mayor's office, Police Commissioner ,Internal Affairs?

CERTIFICATE OF SERVICE

I Jo Ann Fonzone , Esquire aka Judy Mc Grath hereby certify that I have this day caused to be served a true and correct copy of the Interrogatories to the following nonparty at the address below:

Lance Gordon
City Hall , Rm. 168
Philadelphia, Pa 19107

Date: July 19, 2016

Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO.5:12-C-V-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Jimmie M. Schaffer, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time , 30 days and in the manner provided by the Federal rules, sworn answers to each of the following Interrogatories:

1. Do you know the Plaintiff Jo Ann Fonzone in this personal injury action who was injured then falsely arrested for allegedly standing up at a MLB playoff game like all other fans?
2. When and where did you meet the Plaintiff Jo Ann Fonzone?
3. What was or is the nature of your relationship with Jo Ann Fonzone?
4. Have you ever known or seen the Plaintiff to be intoxicated "not in her right state of mind"?
5. Have you ever known or seen Plaintiff under the influence of illegal drugs ?

6. Have you ever known or seen Plaintiff be unruly or is she rather a victim of violent crime and assault despite the existence of her Permanent Protection From Abuse Order against her estranged spouse Cary Woods aka David Lee Roth for direct and vicarious abuse ,including false arrests as a result of false implication by his employees and others?
7. Do you know Plaintiff to have seizures from head trauma she sustained in 1993 in New York upon obtaining a divorce complaint ,years prior to meeting you and have you ever witnessed her having a seizure in 2001 while she lived at your home in Pennsylvania ?
8. Are you aware of Plaintiff's many pre-exisitng injuries to her back, neck, ribs, sternum, etc. prior to the injuries she sustained Ocotober 6, 2010 which would prevent her from any physical fighting?
9. Are you aware of Plaintiff's correct psychiatric diagnosis of PTSD and battered woman's syndrome ?
10. Do you know the family of Jo Ann Fonzone and have you spent holdiays and been with them for other events and gatherings through the years since you met in 1996?
11. Does Plaintiff Jo Ann Fonzone know your family and has she spent holdiays and been with them for other events and gatherings through the years since 1996?
12. Do you and Plaintiff Jo Ann Fonzone know each others friends and have you spent time with them through the years? Do your family and friends like Jo Ann Fonzone?
13. Have you and Plaintiff Jo Ann Fonzone attended MLB games together through the years since you met in 1996 and please estimate how many games you attended together?
14. Have you and Jo Ann Fonzone attended Phillies games at Veterans stadium and Citizens bank park as well as other MLB stadiums through the years and do you know her to be a baseball lover ?

15. Has Jo Ann Fonzone ever been injured then arrested or had any problem with stadium security or the police at any baseball or MLB game ever prior to October 6, 2010?
16. Would you say that you and Jo Ann enjoyed a happy and successful relationship, do you know her to be a competent, true, loyal and honest individual, and will there be a future you two?
17. Do you know Jo Ann Fonzone to drink alcohol excessively so that she is "not in her right state of mind" or would this statement be an untrue attack on her character by one who had injured, then falsely implicated her by lying to the police to cover up his violence?
18. Did you see bruises, contusions, swelling on Jo Ann Fonzone's chest, neck, right arm, hand and shoulder body after she suffered injuries?
19. Have you witnessed the consequences after Jo Ann Fonzone has suffered a head trauma such as concussion, neck pain, hearing problem, migraine headaches, PTSD?
20. Do you know that Jo Ann Fonzone was in the hospital 5 times and cardiac and pulmonary contusions and heart condition atrial fibrillation were directly caused by blunt force chest trauma she suffered October 6, 2010 when officer Kelewischky repeatedly struck her on her chest with his nightstick while trying to get her cell phone after he learned she called 911 for help?
21. Does the fact that Jo Ann Fonzone has suffered continuous injuries and retaliations for having reported her estranged spouse to government agencies, (and her "not yet divorced" status,) for his criminal activities of ID theft, corporate fraud and others have an impact on your relationship and how has this impacted it?

Date: July 5, 2016

By: _____

Jo Ann Fonzone, Esquire, Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO.5;12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Jack Ferryman, non-party to the above titled action, is requested to file with his court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the Federal rules, sworn answers to each of the following Interrogatories:

1. How do you know and how many years have you known Plaintiff Jo Ann Fonzone and do you know her to be of sound mind?
2. Did you drive Jo Ann Fonzone to Philadelphia Criminal Justice center on July 18, 2011?
3. Prior to July 18, 2011, did Jo Ann Fonzone tell you she retained a defense attorney Robert Dixon to represent her on disorderly conduct charges because she was not being properly represented by the public defender associates as they had not gotten the charges dismissed?
4. Did Mr. Dixon show up July 18, 2011?
5. When Mr. Dixon failed to appear, and Ms. Fonzone told Judge Pew that she wanted to represent herself because he had not shown up, was anything else said or done by Ms. Fonzone prior to the Judge ordering the sheriff to take her to the basement for a psychological evaluation?
6. While Ms. Fonzone was in the courthouse jail, did an officer return to the courtroom and inform the Judge that Jo Ann needed her heart medication as she had gone into atrial fibrillation and had asked that you go to the car and get her

heart meds for her?.

7. Did you then go to the car and get her heart medication and return to the courthouse with them?
8. Did you have to wait all day while Jo Ann Fonzone was kept in the courthouse jail until the end of the day when she was returned to the court room then released by the Judge?
9. Did you think it was unnecessary for the Judge to order such an eval without any reason and in spite of Jo Ann Fonzone's objections?
10. Did you see Jo Ann Fonzone at her mother's home ,where she was recovering from the brutal assaults , six days after she was injured by Joe Oteri and the police Ocotber 11, 2011 and take photographs of brusies and contusions on her arms, hands, wrists, shoulder and chest?
11. Were the bruises and contusions starting to heal and lighten in color by that time ?
12. Are you aware that Jo Ann Fonzone has been a victim of injuries , false arrest and retaliation and has a long ongoing divorce action since being legally separated since 1993?
13. Are you aware that Jo Ann Fonzone travelled to Los Angeles and retained new divorce lawyers in 2006, after previous lawyers since 1993 did not loyally represent her ,and she is still not yet divorced?
14. During the 46 years you have known Jo Ann, have you ever known her to take illegal drugs or drink alcohol in excess or ever see her intoxicated , unruly , out of control or "not in her right state of mind"?

15. Have you ever known Jo Ann Fonzone's behavior to be out of control or is she a victim of violent behavior, misconduct, stalking, crime and assaults despite the existence of her Permanent Protection From Abuse Order against her estranged spouse Cary Woods aka David Lee Roth for direct and vicarious abuse, stalking, including false arrest as a result of false implication by his employees and others?
16. Are you aware of Jo Ann's many pre-existing injuries and chronic pain, prior to the injuries, (including back surgeries, neck, rib, and sternum fractures, etc.) she sustained October 6, 2010, which would prevent her from any physical fighting?
17. Are you aware of Jo Ann's correct psychiatric diagnosis of PTSD and battered woman syndrome, victim of violence while trying to get a divorce?
18. Do you know Jo Ann Fonzone to be a person of integrity, honesty, and loyalty?
19. Have you ever seen Jo Ann Fonzone drink excessive alcohol so that she is "not in her right state of mind" or would this fabrication be a false attack on her character by a man who had injured, then falsely implicated her by lying to the police to cover up his violent assault crimes and misconduct?
20. Do you know that Jo Ann was in the hospital 5 times and her cardiac and pulmonary contusions and heart condition atrial fibrillation were directly caused by blunt force chest trauma she suffered October 6, 2010 when officer Kelewishcky repeatedly struck her on the chest with a nightstick while trying to get her cell phone from her after he learned she called 911 for help at 6:15p.m. from the stadium police room jail cell?
21. Do you know that Jo Ann Fonzone has since 1993 suffered continuous injuries and damages including physical, legal, economic, retaliation for having informed various government agencies about her estranged spouse and his lawyer's criminal activities of ID theft, fraud, and others?

Date: July 5, 2016

By: _____ --

Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

David Ayers, defendant in the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the Federal rules, sworn answers to each of the following Interrogatories:

1. What date, how, where, why and from whom did you first get any information about the disorderly conduct case against Jo Ann Fonzone?
2. In the initial communication, what exactly were you told about Jo Ann Fonzone, what information and documents or papers were you given and by whom?

3. What subsequent communications did you have about Jo Ann Fonzone , with whom, on what dates, manner of communication, and what was the content and subject matter of those communications?
4. As she had not yet appeared in court on this matter, who was responsible for putting Jo Ann Fonzone through mental health court , psych evals, and when was the decision made, what were the precise circumstances of that decision?

5. Jo Ann Fonzone was unable to appear in court on this matter until July 18, 2011 as she was undergoing treatment for physical injuries and complications related to those injuries of October 6, 2010 from that date and is continuously treating for the resulting heart condition ; when and by whom were you or your office made aware of this fact?
6. Jo Ann Fonzone informed and sent medical documentation on a continuing basis to the Defender Associates immediately upon first contact with them during a lengthy telephone interview with Kim Gray employed there at the time; as the defenders had subpoenaed the 911 audio when Jo Ann called for help after being assaulted by police, did Mr. Kelly, Ms. Vargas , Ms. Finlander or Mr. Angelo ever tell you or your office or the Court that Jo Ann Fonzone was physically unable to appear as she was the injured victim in this case?
7. What was the date of the first proceeding you appeared in the disorderly conduct case against Jo Ann Fonzone, was it September 28, 2011, October 19, 2011 , November 23, 2011, January 25, 2012 or April 25, 2012?
8. What date did Jo Ann Fonzone's private attorney Mr. Frumer give you the report he had since October 19, 2011 from independent psychiatrist Dr. Smith which diagnosed her with PTSD and found her competent ?
9. If you had the report , why did you not ever give the report to the presiding Judge, and consequently , she ordered another psych eval, April 25, 2012 months later while dragging Jo Ann Fonzone , a mentally competent individual through mental health court unnecessarily and unjustly after many continuances ?

10. Did Mr. Angelo of the Defender Associates or anyone else, and name that or those persons, ever give you a copy of a newspaper article about Jo Ann Fonzone which was completely false, the subject of defamation litigation and and prejudicial?
11. Do you believe the veracity of everything you read in a newspaper or other media outlet, or do you question others for their motive to libel and slander? Do you the truth is important, and that the function of a prosecutor is to seek the truth in a criminal case?
12. Do you believe that an individual who is deemed incompetent by a court psych eval is entitled to due process and a hearing on the issue, to present witnesses, to testify to demonstrate that she is competent, to present different professional opinions to completely and directly refute the court psych opinion, Jo Ann Fonzone filed Objections about the mental health court status, did anyone read them? Soon after being retained and upon reading Dr. Smith's report, private attorney Douglas Earle filed a Motion to vacate the Incompetency finding on March 7, 2012, did anyone read his Motion?
13. If you answered yes to the above, then why was Jo Ann Fonzone denied a hearing on this issue from July 18, 2011, (when a court psych who's only concern was whether Jo Ann Fonzone was going to take a plea erroneously deemed her incompetent because she refused to take a plea until), May 23, 2012 when the presiding Judge finally got a third psych eval report of April 25, 2012 where she was found competent?

14. Did you or anyone in your office read the pre trial report where it is stated that Jo Ann Fonzone is legally separated , Motions to dismiss, is it part of the prosecutor's job to read the court file?

15. Did you or anyone in your office ever interview or question Jo Ann Fonzone about anything, the circumstances surrounding this case , any physical injuries she sustained, the Internal Affairs complaint she filed, or her Permanent Protection From Abuse Order for example?

16. Do you believe that a prosecutor is to prosecute only when there is sufficient evidence that a person committed a crime and can meet the burden of establishing the elements of the crime, and that it is not the function of a prosecutor to harass an innocent individual?

17. Do you know what, precisely when and by whom probable cause was established in this case, please provide details?

18. Do you believe that violent police officers who commit aggravated assaults resulting in serious injury or death to American citizens should be shielded from arrest and prosecution or should the law be applied equally to all Americans regardless of their occupation or government employ?

19. Did you or anyone in your office receive a copy of Jo Ann Fonzone's IA complaint with attachments from John Evans of Internal Affairs, as protocol on the back of the form states that a copy of the complaint is to be forwarded tot eh District Attorney?

20. Do you believe that the truth was sought, considered , or important to anyone prosecuting this case , if so, who exactly?

21. If the answer was yes to the above, please provide specific examples of who, what , when where and how the truth was sought by any prosecutor in this case?

22. Do you think that injured crime victims should be prosecuted in order to be politically correct and protect those violent abusers who injured them from criminal accountability if the perpetrators are police officers or security guards who made a false arrest?

Date: July 6, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy ,Mc Grath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories herein upon the party on the date and at the address listed below:

David Ayers
Philadelphia District Attorney's office
3 S. Penn Square
Philadelphia, Pa 19107

July 6, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12- CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Defendant in the above titled action Elizabeth Kotchian , is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the Federal rules, sworn answers to each of the following Interrogatories:

1. Were you present in Judge Stack's courtroom June 13, 2012 during a colloquy between the Judge, Jo Ann Fonzone and you as to whether she could represent herself that afternoon as Mr. Earle had left and she had witnesses there and wanted to proceed?
2. Did the trial occur or was it again continued because you the prosecutor had no witnesses?
3. Do you recall hearing the Judge Order, that " must be tried next proceeding or case dismissed"?
4. Were you present at the next proceeding July 20, 2012 with Judge O'Neill, and was the case dismissed as per Judge Stack's Order the month prior?
5. Do you recall July 20, 2012 objecting to Jo Ann Fonzone representing herself and misrepresenting to the Judge that "she could not as per Judge Neufeld's order," though you were aware that there was a subsequent order from Judge Neufeld of May 23, 2012 where she found her competent , and a more recent Order of June 13, 2012 where Judge Stack appointed her to represent herself?

6. After the proceeding with Judge Stack, did you on June 13, 2012 in the lobby of 1301 Filbert St. Philadelphia hand Jo Ann Fonzone the only discovery she received almost two years after the incident, a few pages of discovery consisting of a police report signed by officer Ortiz and an arrest photo.?

7. Were you aware that Jo Ann Fonzone, Esquire had filed Bill of Particulars, Pre-trial discovery requests, Motions to dismiss, and Pa Right-to-know requests in this case since November 9, 2010, received nothing prior thereto, and that there were 4 Discovery violation Orders issued by Municipal Judges?

8. Is it part of your duties as asst. Prosecutor to read the court file on a case which you are assigned so as to know what is going on procedurally?

9. What information, when, where and by whom were you given information about Jo Ann Fonzone prior to your participation in this case?

10. Why did you withhold exculpatory Brady material discovery in your possession since December 13, 2010, such as the hospital transport police report, which evidenced that Jo Ann Fonzone was taken to the Emergency Room by the police October 6, 2010 after being seriously injured by security and the police?
11. Do you habitually fail to disclose or hide and suppress exculpatory evidence which demonstrates that the individual you are prosecuting is actually the innocent injured crime victim?
13. When and how did you become aware that Jo Ann Fonzone had filed an Internal Affairs complaint against the police for brutality and serious injuries?
14. Are you aware, and where, when and how were you made aware of any other complaints Jo Ann Fonzone filed with government agencies in regard to this case against her for disorderly conduct?
15. Did you receive a letter dated June 28, 2012 from Jo Ann Fonzone stating that she had not received requested discovery and that you were in violation of Judge Stack's Order of June 13, 2012 by refusing to provide the discovery including the hospital police report, fingerprints, videotape at stadium, etc.?

16. Do you know Frank Fina , when and where did you meet him?

17. Were you in Judge Kosinski's courtroom August 22, 2012 when Jo Ann Fonzone made a 1013 Motion to dismiss with prejudice based on 237 correctedly calculated days vioaltion of speedy trial rights?

18. When charges are dismissed with prejudice , does that mean that the case cannot be refiled by the prosecutor?

19. When you refiled by appealing Judge Kosinski's dismissal with prejudice Order on September 21, 2012, why did you not serve Jo Ann Fonzone with a copy of your appeal and provide the required due process notice ,as you were well aware that she had been representing herself since June 2012 on this case because you were the prosecutor in court June, July and August ?

20. Are you aware that Jo Ann Fonzone discovered that you appealed when she tried to file an Expungement petition , and was not allowed to file it at the CJC Motions counter ?

21. How many times did you or your assistant Greg Engle go to court after you appealed the dismissal, from September through December, 2012 without Jo Ann Fonzone or any defense counsel being present for your ex parte communications with the Court, where you continued to misrepresent to the Court that she could not represent herself so that December 31, 2012 when she was not present to object, a lawyer was appointed?

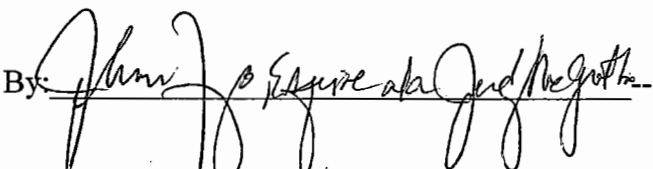
22. After Judge Eubanks found Jo Ann Fonzone not guilty, after trial January 18, 2013, why did you continue to rant until she acquiesced to a summary disorderly conduct charge; are you that vindictive and hate her that much and why, did someone slander her to you?

23. Were you aware that the day prior to the trial January 17, 2013, your associate Engle objected and got the hearing dismissed on Jo Ann Fonzone's private citizen complaint against the security guard who had injured her then lied to police to falsely implicate and have her arrested, and that had the hearing occurred, there may have been no trial January 18, 2013?

24. What did you say to Jo Ann Fonzone's appointed counsel Richard Patton July 15 2013, (the day discovery was closed) when she saw you in the hall talking to him before he ever met his client; and what did you say or do to Ms. Rainey sometime between August 19 and October 2 to turn her against her client?

25. Throughout the prosecution, you your office misrepresented facts to the Court, hid exculpatory evidence, treated Jo Ann Fonzone like a criminal rather than the innocent injured crime victim of violent injurious assaults, false implication, stalking, she is, failed to read her Motions, changed a court date from November 22 to November 21, 2013, without notifying her so you could have security guard Oteri's civil lawyer come in and testify without objection or Jo Ann Fonzone, appeared many times ex parte by failing to give Jo Ann Fonzone notice, neglected to read the court file, containing Motions, medical reports, a permanent Protection From Abuse Order against her estranged spouse, (which is supposed to protect her from false arrest and vicarious abuse by others) her Application for Continuance of September 9, 2011 for medical reason as to why she was not in court September 21, 2011, and then issued a bench warrant to have her locked up for six days; is this your idea of justice, prosecute victims rather than truth seeking to hold violent perpetrators accountable, just what exactly was the probable cause for arrest as she cheered at a MLB playoff game, then was brutally and aggravatedly assaulted and has permanent health problems as a result?

Date: July 7, 2016

By: 
Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO.5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Defendant in the above titled action, Greg Engle, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the Federal rules, sworn answers to each of the following Interrogatories:

1. How long have you been employed by the Philadelphia District Attorney and is Elizabeth Kotchian your supervisor?
2. When was the first time you appeared in court on the disorderly conduct case against Jo Ann Fonzone aka Judy Mc Grath, and how many times did you appear ex parte in front of Judge Patrick from September 2012 through December 2012?
3. How many times and what were the dates of your appearance in the case from January 2012 until your last appearance on this case?
4. Do you recall being personally served with a copy of Jo Ann Fonzone's Private Citizen complaint Appeal in the courtroom December 17, 2012 by Jo Ann Fonzone, prior to the proceeding with Judge Patrick?

5. Why , knowing that Jo Ann Fonzone represented herself at the time she filed an appeal to the denial of her private citizen complaint against Joe Oteri security guard who injured Jo Ann Fonzoen so that she had ac oncussion and seizure from head truma as he pushed her into the seat,then lied to police to cover up his assault crime, and that the clerk scheduled a hearing on her appeal, did you object and move for dismissal of the scheduled hearing on January 17, 2013, so that the Judge cancelled the hearing after Jo Ann Fonzone left the courtroom because you objected when she told the court she was self-representing and then someone threatened to call the sheriff ?

6. During the afternoon session with Judge Patrick, when Jo Ann Fonzone's appointed counsel Ms. Snyder was present for the first time and Jo Ann Fonzone was not, you knew she had counsel, why did you have the private citizen complaint hearing dismissed while her clinet was absent?

6. Why , when you knew there was a conflict of interest because were two motions with two different docket numbers, before Judge Patrick January 17, 2013, didnt you recuse yourself on one of the cases as you couldnt represnt Jo Ann Fonzone the complainant on her private citizen complaint while you were prosecuting her for disroderly conduct on the other case ?

7. Do you recall Jo Ann Fonzone telling Judge Patrick December 17, 2012 that she had not been served with the prosecutor's appeal of the dismissal with prejudice of the charges against her, and that she learned of it when she tried to file her Expungement petition the clerk said they appealed and then Judge Kosinski verified it.?
8. Do you know that prosecutorial misconduct, such as failure to serve process, as Ms. Kotchian deliberately failed to serve Jo Ann Fonzone, though she was aware she had been representing herself, constitutes grounds for dismissal of charges against a defendant?
9. Do you recall on December 17, 2012 Ms. Fonzone objecting to your condescending dribble about "her having been incompetent at those months", and "they played games with the JFK reports paperwork misrepresenting to the Court that they didn't have the psych reports and stating in court ", "I have never been incompetent. I was diagnosed with Post traumatic stress disorder, and suffered serious physical injuries as a victim of aggravated assaults and was in the hospital several times for the injuries."
10. Though Judge Neufeld on May 23, 2012 had determined upon reading the psych evals from JFK and court psychiatrist that Ms. Fonzone was competent, do you recall Ms. Fonzone stating to the court December 17, 2012, that "after a colloquy with Kotchian, myself and Judge Stack, the Judge determined on June 13, 2012 that I" was very competent, capable and appointed me to represent myself, but the Commonwealth was not ready as it had no witnesses, the Judge Ordered, "must be tried next time", no more continuances ".?
11. As the aforementioned is all accurate and true, why did you and Kotchian insist in bad faith on knowingly misrepresenting to the Court from July 2012 through the rest of the proceedings March 2014 that Ms. Fonzone was incompetent and couldn't represent herself as per Judge Neufeld's Order?

12. On February 12, 2013, do you recall that Jo Ann Fonzone told Judge Patrick that she had filed a motion to vacate the summary disorderly conduct conviction, and she wouldn't allow her to argue and continued until March 4, and you said "the Commonwealth will be ready for TRIAL on March 4."?

13. Do you recall February 12, 2013 Ms. Fonzone and Ms. Snyder both informing the Court that they could not be present March 4?

14. Were you in court March 4, 2013 ex parte on this case?

15. Do you recall February 12, 2013 Ms. Fonzone stating to Judge Patrick, "I think it's a conflict of interest if he's supposed to represent me as a victim in that case and he's prosecuting me on the summary and I would respectfully request that another ADA be assigned to this private citizen complaint appeal"?

16. Do you recall what you replied, "the procedure is that when a private citizen complaint is declined, at the petitioner's request at that time it may be forwarded to the president of the Municipal court for review. That did not occur." and I said, "Yes it did, excuse me." Then the Judge silenced me. Since you were personally served with a copy of the private citizen complaint appeal, docket # 00000MD-61-2013, in court December 17, 2012, why did you blatantly lie to the court and say that I did not appeal the district attorney's denial to the President Judge?

17. Did you hear on February 12, 2013 Jo Ann Fonzone provide the court with a factual account for her private citizen complaint, that she had been "injured by Joe Oteri at 5:45 p.m. outside at her stadium seat, that was the first incident...and they willfully withheld that in bad faith crucial evidence from the defense" ., "I was taken to the hospital by two police officers, they at no time disclosed the police report..I got that evidence 2 years later then filed the private citizen complaint as soon as I learned the security guard's name"

18. Do you recall telling the court June 24, 2013 that " Judge Eubanks herself heard and denied that motion" (post judgment motion to vacate), were you referring to the Motion filed by Jo Ann Fonzone or the Motion filed later by Marni Snyder; and were you present when Judge Eubanks heard the Motion and when exactly was that?

19. Did you hear Jo Ann Fonzone state that July 18, 2011, "I didnt want the Defenders to represent me because they were negligent. I was actually the crime victim. I now have a heart condition, atrial fibrillation, as a result of being assaulted then falsely implicated into the criminal system by the security guard. However, the Commonwealth wants to treat me as a defendnat rahter than the victim that I am."? What was the reason that the prosecutors went after Ms. Fonzone with a vengeance , violating her constitutional rights in bad faith with willful misconduct on disorderly conduct as though she was a murderer?Did you ever listen to teh the 911 call Jo Ann Fonzone made after she was thrown against the wall by the police officer ?

21. Did you hear Ms. Fonzone state that " the evidence of the Commonwealth was insufficient to have rendered a guilty verdict on even sumamry disorderly condcut . I ws seriously injured in two separate incidents the samme evening at citizens bank park on October 6, 2010. I dont think they met their burden for even a summary conviction...the Commonwealth's witness's tstimony was contrary to the truth.", I did nothing wrong or illegal., I was watching a playoff game "?

22. Do you know when where and what precisely was the probable cause for the arrest?

23. Do you frequently prosecute crime victims and private citizen complainants at the same time or was Jo Ann Fonzone the first injured crime victim that you prosecuted; it is the job of the district attorney to seek the truth , not to suppress evidence and harrass innocent injured crime victims , is it not?

24. Why do you think Sargeant Addison of the Philadelphia police department was never questioned or interviewed by law enforcement about October 6, 2010?

25. You were aware that an Appeal had been filed February 11, 2013 for the summary disorderly conduct charge, doesn't the trial in Common Pleas have to occur 120 days after the appeal is filed?

CERTIFICATE OF SERVICE

I Jo Ann Fonzone , Esquire aka Judy Mc Grath hereby certify that I have this day caused to be served a true and correct copy of the Interrogatories upon the following at the address listed below:

Greg Engle, Esq.
Philadelphai district attorney office
3 S. PennSquare
Philadelphia, Pa 19107

July 18, 2016

BY: _____

Jo Ann Fonzone , Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka Judy Mc Grath, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

Jackie Coelho, nonparty to the above titled action is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the federal rules, sworn answers to each of the following as Interrogatories to nonparty are depositions on written questions:

1. How many years have you been a prosecutor, and how many years were you employed by the Philadelphia district attorney?
2. Were you aware on June 24, 2013 that your office had violated 4 discovery orders for failure to produce discovery and exculpatory evidence, and as of that date had still not produced some discovery, like fingerprints of Jo Ann Fonzone taken at the police district which evidenced the tremendous swelling of her right hand from injuries to her hand by security guard prior to arrest?
3. Were you aware on June 24, 2013 of all the facts in this case, did you read the trial transcript of January 18, 2013, specifically the testimony of Jo Ann Fonzone who was the only one who stated the facts for the record?
4. Were you aware that Jo Ann Fonzone's dismissal on a 1013 had been appealed September 21, 2012 and that she had never been served with Notice of the appeal until December 17, 2012 when she went to 3 S.Penn Square and asked Greg Engle for a copy of the appeal, after trying to file her Expungement petition?

5. The Motion to vacate was to be argued June 24, 2013, why did you appear in the afternoon session to assist Mr. Engle, was it because his objection and conflict of interest had wrongly denied Jo Ann Fonzone a scheduled hearing on her private citizen complaint against security guard Oteri January 17, 2013 ; the outcome of which would have resulted in his arrest and her release, case dismissed and dispensed with the need for the trial Janaury18,2013 on charges brought by his false implication and harrassment of an innocent victim?
6. Do you think that a person diagnosed with PTSD because he or she suffered a physical trauma with serious injuries is incompetent , and do you know what battered woman syndrome is, have you listened to the 911 call Jo Ann Fonzone made while in custody after she was thrown against the wall the first time by Officer Kelewischky, one of the two male arresting officers?
7. Do you think that the job of a prosecutor is to seek the truth in every case and to ensure that the appropriate people are brought to justice and prosecuted when there is sufficient probable cause and evidence that a crime has been committed, do the assistant prosecutors in your office also believe that and conduct themselves like that, or do they sometimes violate constituitional rights and court and Professional Responsibility rules a in order to get heir desired result, conviction without concern if the defendant is actually innocent?
8. Do you think a prosecutor has an obligation and a continuing duty to disclose evidence exculpatory or inculpatory ,any evidence they have upon request in pre-trial discovery or Right to Know to the defense, where is the videotape from Citizens bank park of the October 6, 2010 playoff game, do you know Jennifer Lin of your office and Michael Dwyer , Right to-Know officer for the police department and that Jo Ann Fonzone requested through the Right to Know Act copies of all police reports , etc. after the police and prosecutor refused in bad faith to produce any discovery to defense for 2 years so that four different Juges issued discovery vioaltions orders in Municipal court and to date some discovery has been withheld?

9. Were you present in the court when Judge Minehart said to Ms. Fonzone, when she mentioned that her fingerprints would show that the size of my hand was about five times...larger " You go down to the Roundhouse , police administration, they'll give you your fingerprints and your photo. That's what lawyers would do, and you're a lawyer. So, that 's what you have to do."

10. Did you or anyone in your office ever interview Jo Ann Fonzone as a victim witness at any time since October 6, 2010; was any investigation conducted by your office about the two incidents of October 6, 2010, the first at 5:45 pm in the stadium section and the second at 6:15pm while Ms. Fonzone was in police custody?

11. Did your office ever receive (as protocol on the back of the form,) from IA John Evans , Jo Ann Fonzone's Internal affairs complaint with names of witnesses, attachments and her Permanent Protection From Abuse Order ,a copy of the interview with Internal Affairs John Evans and Christine Mc Shea January 28, 2011 or a copy of the private citizen complaint against Oteri with names of witnesses and attachments, including JoAnn Fonzone's Permanent Protection From Abuse Order against her estranged spouse Cary Woods aka David Alee Rothwhich is supposed to protect her from vicarious abuse and false arrest .?

12. Do you know why John Evans would not subpoena the 911 audio though Jo Ann Fonzone told him about it and that she was in fear for her life after being thrown against the wall by Officer Kelewsichky, have you heard the 911 audio, the call was made before he threw her against the wall a second time then proceeded to strike her repeatedly on the chest because he learned she had called 911 for help after being assaulted ?

13. Why did prosecutor Kotchian choose not to interview Sargeant Addison the officer who saw Jo Ann Fonzone's beaten and bruised body and told her she needed to go to the hospital for medical attention, or ER staff , or her primary physician or her family and friends ?

14. Why was the police hospital transport for where two officers picked Jo Ann Fonzone up at the 1st district to transport her to the Emergency Room October 6, 2010 not produced until two years after the incidents, though requested through pre-trial and Right to Know requests since November 2010?
15. As discovery was closed at arraignment July 15, 2013, why did prosecutor Kotchian bring in prejudicial and disallowed documents and witnesses who were not eyewitnesses after that date, did you hear prosecutor Engle on June 24, 2013 reply "It will be the same as the other trial.", when Ms. Fonzone asked, "Now, do they have to disclose to me the names of their witnesses?" then the Judge said, "Same as the other trial, same witnesses okay?"
16. Did you or anyone in your office send or receive emails or other ex parte communications containing any negative, prejudicial, derogatory articles or any information about Jo Ann Fonzone or her legal issues from any private party, government entity, ex-lawyer, estranged spouse, or anyone at anytime from or prior to October 6, 2010 or at anytime thereafter?

17. Were you aware that prosecutors were going to court ex parte from September 21, 2012 through December 2012 because Jo Ann Fonzone had not been served with the NOA by asst. Kotchian who was present and aware that she was representing herself from June 13, after colloquy and Judge Stack appointed her through August 22, 2012 when she got her case dismissed?
18. Do you think it is a violation of an individual's Constitutional rights to due process to not be notified to appear and have the opportunity to appear, or that her criminal case dismissal had been appealed as it was refiled and was continuing ex parte without her knowledge, doesn't this constitute bad faith too and grounds for dismissal, are you aware that both of the Informations, contained incorrect elements the first for misdemeanor disorderly and second for summary disorderly were incorrect and contained no facts as required for sufficiency of the instrument?
19. Can a case be appealed when it was dismissed with prejudice, what, where, when was the probable cause that Jo Ann Fonzone was committing a crime as she cheered, like all the other fans, for the Phillies and who determined it?
20. Did you hear June 24, 2013 Jo Ann Fonzone say that "she wants to be heard and speak out for victims", is that at all important to you considering the ever increasing amount of violence against women in the United States?
21. Did you hear June 24, 2013 Jo Ann Fonzone say, "I was co-counsel with the one court-appointed Ms. Snyder because this has been a financial drain on me, I'm sort of disabled from the injuries and not seeing any gainful employment right now.", and then "I've spent many thousands of dollars in the past three years on this case."?

22. Is it the usual course of business for assistant prosecutors to use any means to get a conviction including slander, harrassment, ex parte communications and court apperances, prejudicing judges and defense lawyers against defendants, dragging defendants unnecessarily through mental health court to smear their reputations and gain advantage in the proceeding, delay the proceedings by not having witnesses, misrepresenting facts to the court, hiding exculpatory evidence, objecting to hearings on private citizen complaints, failing to interview defendant injured crime victim or investigate the case, allowing perjured testimony of prosecution witnesses?
23. Do you believe in equal justice under the law, do you think there is equal or selective justice in the United States, does the Philadelphia District Attorney's office condone and practice sharia rather than Constitutional law? Do you think we officers of the court and we the people have a duty to report and make an effort to clean up and expose corruption when we see or are victim to it, Why did you misrepresent to the Court June 24, 2013 that, "there was no exhibits", when discussing the January 18, 2013 trial with Ms. Snyder as co-counsel, when there actually were several exhibits.?
24. Did you hear Jo Ann Fonzone tell the Court June 24, 2013 she informed the triage nurse she was an assault victim? Did you hear Mr. Engle read Ms. Fonzone's trial testimony, pg. 50, "I had my cell phone in my left jacket pocket and I dialed 911 saying that I needed help because I was being physically attacked."?
25. Were you aware that an Appeal had been filed by Ms. Snyder February 11, 2013 for the summary disorderly charge, (though its questionable whether it was vacated January 29, 2013 as Mr. Engle said there was motion hearing and the order is ambiguous as someone wrote on it after it was signed), ergo, the trial in Common Plese court has to occur 120 days from that date of February 11, 2013?

Date: July 17, 2016

BY: _____
Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone Esquire aka Judy Mc Grath hereby certify that I have on this day caused to be served by U.S. Mail a true and correct copy of the aforementioned upon the following at the address as appears below:

Jackie Coehlo, Esq.
Philadelphia District attorney office
3 S. Penn Square
Philadelphia, Pa 19107

July 17, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS

JOE OTERI, ET AL, DEFENDANTS

NO. 5:12:-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

Dennis Kelly, Ms. Vargas, Chris Angelo, defendants in the above titled action, are requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the Federal rules, sworn answers to each of the following Interrogatories:

1. What date, how, where, why and from whom did you first get any information about the disorderly conduct charge against Jo Ann Fonzone?
2. From whom, when, where and how did you receive any subsequent information, documents, newspaper articles, internet communications, what was that information, and what actions or inaction was taken as a result of receiving the information?

3. Who in your office is responsible for questioning the existence, if any, of probable cause and evidence in a case and whether or not a false arrest was made and whether the defendant is actually innocent, as an officer of the court do you think it is important for lawyers to report public and other corruption of which they have knowledge so that the criminal justice system is fair, unbiased, impartial and treats every American equally?
4. What is the procedure of your office at the start of a case, who initially has contact with the person arrested, what is the procedure for representation of the client?
5. Did Kim Gray of your office subpoena a videotape from the Phillies organization or the police of the stadium incidents of October 6, 2010?
6. After Kim Gray had an hour long telephonic interview with Jo Ann Fonzone on October 15, 2010, and said, "Wow, you really are the victim.", why was she not subsequently allowed to speak with her or represent her?

7. Why did you disallow Jo Ann Fonzone or any other defense lawyer from having a copy of the 911 audio CD which was subpoenaed by Kim Gray and which demonstrated that Ms. Fonzone was an injured crime victim calling for help while handcuffed in custody after being brutalized by a police officer?
8. As an officer of the court, who is supposed to seek justice, why didn't you present the 911 call to the presiding judge and/or prosecutor and have the charges dismissed immediately upon obtaining the 911 audio of a crime victim, rather than concealing its existence from the court?
9. When Jo Ann Fonzone was continuously sending medical reports to your office for explanation as to why she could not appear because she was a crime victim receiving treatment for injuries and a heart condition sustained October 6, 2010, why weren't the Defender associates conveying that fact to the presiding Municipal Judges for purposes of dismissal and investigation of the violent perpetrators who injured her?

10. Who is in possession of the notes or recording of the interview Kim Gray had with Jo Ann Fonzone October 15, 2015, and why didnt you allow her to appear in court when subpoenaed by private counsel to bring them with her several times ; what is Kim Grays' address and phone number?
11. Why wasn't any investigation or inquiry conducted into the incidents, why wasn't the Jefferson Emergency Room staff questioned or any other personal knowledge witnesses including , the Sargeant who saw the bruises and contusions and sent her to the ER or family and friends of Jo Ann Fonzone?
12. Why wasn't client Jo Ann Fonzone given information about what occurred in court when she couldnt be there as she was treating for injuries, so that she had to phone your office regularly, ask what was going on and why your office didn't get the false and malicious retaliatory charges against her dismissed as she really was the innocent injured crime victim ?
13. Why didn't your office file any pre-trial discovery requests, so that Jo Ann Fonzone had to file these and Motions to dismiss , and your office neglected to argue these?

14. Did you or anyone in your office know that that it was police protocol to write and file a police report when the police transport an injured person to the hospital and that there was such a report because Jo Ann Fonzone was injured prior to by security guard Oteri and subsequent to arrest by officer Kelewsckky ?
15. If the answer to the above question was yes, then why didn't your office obtain and provide a copy of the report to Jo Ann Fonzone as the report is required for submission to the Crime Victims Board for compensation for medical and other out of pocket expenses incurred by crime victims?
16. Other than a fax being transmitted to your reception area fax machine at precisely the time Jo Ann Fonzone was standing at the receptionist area, of the Defender Associates office , were there any other untrue, libelous, slanderous, inaccurate, inflammatory communications from outsiders or prosecuting attorneys to your office about Jo Ann Fonzone; including but not limited to emails, phone calls, internet false commentaries or other modes of communication, please list names of sender, recipient, date , time, mode of communication?

17. Why didnt Ms. Vargas inform the court that Jo Ann Fonzone was seriously injured Ocotber 6, 2010 and therefore couldnt be in court , the consequence of which was that a bench warrant was issued in April, 2011?
18. When Jo Ann Fonzone phoned your office April 28, 2011 to say she couldnt appear April 29 as she was recuperating after recently been discharged from a cardiac hospital , left a recorded voice mail message on Ms. Werthy's voice mail, why didnt Ms. Vargas convey this message to the court, the effect of which that the Judge issued a bench warrant April 29 for non-appearance , and she had to appear June 16 when she learned there was a bench warrant with her hospital records to have the bench warrant lifted?
19. After the bench warrant was issued April 29 and outstanding , why wasn't Jo Ann Fonzone notified of the outstanding warrant by someone in your office?
20. Were you aware that Jo Ann Fonzone has a Permanent Protection From Abuse Order against her estranged spouse which allegedly is to protect her also from vicarious abuse and false arrest in retaliation for trying to get a divorce since 1993 and informing the government of her knowledge about his criminal activities of fraud and ID theft ?

21. Are you aware that Jo Ann Fonzone has suffered from a pattern and practice of physical injuries and retaliation prior to and since 1993 and has many pre-existing injuries therefrom?
22. Are you aware that a Lieutenant and a Sargeant of Internal Affairs determined her IA complaint to be valid and determined that she was a confidential informant?
23. Are you aware that Chris Angelo on July 18, 2011 had a copy of the 911 CD and a copy of a newspaper article about her, which was in his file, when she was in the court jail awaiting a coerced unnecessary psych eval prompted after and because Jo Ann Fonzone told the court she wanted to represent herself as the Defender Associates were not adequately representing her and the private lawyer she retained Mr. Dison had not shown up?
24. Presumably, the Defender Associates were prejudiced against their client Jo Ann Fonzone as a result of reading and believing without questioning her or the contents of the libelous newspaper article, and therefore could not effectively represent her, who, why, and for what purpose was the article faxed to your office or otherwise made your office aware of its existence?
25. Do you think that the police ever make false or pretext arrests when there is no probable cause to arrest, do you think there is ever police or prosecutor misconduct, or police brutality of innocent individuals, or does your office always believe anyone arrested is guilty of something and assist the prosecution in getting convictions regardless of what the facts, truth and circumstances actually are?

Date: July 19, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I Jo Ann Fonzone, Esquire aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories on the following parties by U.S. mail :

Dennis Kelly, Ms. Vargas, Chris Angelo
Defender Associates
1441 Sansom St.
Philadelphia, Pa 19102

07/02/16

By: _____

Jo Ann Fonzoen, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

Robert Strouse, nonparty to the above titled action is requested to file with his court and serve the undersigned counsel for Plaintiff, within the time , 30 days and in the manner provided by Federal rule 33, sworn answers to depositions on written questions:

1. Did you receive a request in Novmebr 2010 for a videotape from the Plaintiff taken at Citizens bank park Ocotober 6, 2010?
2. Did you provide a videotape to Plaintiff?
3. Are there videocameras at Citizen's bank park ?
4. Were there videocameras at the stadium recording at the playoff game on October 6, 2010?
5. Is there a videotape of the game of October 6, 2010?

6. Are you responsible for employing ssecurity guards at the stadium for the Phillies organization?
7. If you are not responsible for securityat he sstadium, what is the name of the person in charge of security?
8. Do you know the security guards?
9. Do you know Joe Oteri?
10. What kind of background anad criminal checks , if any, are done before employing a security gaurd?
11. Who is responsible for such background checks ?
12. Are there any pre-employment interviews for security guards and if so, who is responsible for conducting those interviews?

13. Are security guards delegated duties by the police ?

14. What are the duties of security guards at Citizen bank park, are they supposed to patrol around , determine probable cause for arrest and write affidavits of probable cause?

15. How are the duties of security guards ,which they perform for the Phillies , any different if at all , from duties delegated by the police?

16. Are the security guards frequently solely responsible for the arrest of Phillies fans and howmany arrests has security guard Joe Oteri be solely responsible for?

17. Are security guards often responsible for seriously injuring innocent Phillies fans then running for the police to falsely implicate the fans rather than getting medical help for fans they injure?

18. Do all of the security guards have side jobs or other employment while employed as security guards for the Phillies organization?

19. Are the security guards required to disclose the name and address of their other current employers to the Phillies organization?

20. How long has Joe Oteri been a security guard for the Phillies organization and is Joe Oteri still a security guard for the Phillies organization?

21. If Joe Oteri is still employed by the Phillies organization, is it the policy of the Phillies organization to continue the employ of violent employees who harass female fans, cause serious injury to a female fan then falsely implicate the female fans to cover up his violent aggravated assault and egregious misconduct?

22. Are you aware that Joe Oteri blatantly perjured himself about the incident and slandered the seriously injured Plaintiff?

23. Are you aware that plaintiff suffered head trauma, had a seizure and concussion as a result of Joe Oteri's violent misconduct on October 6, 2010?

24. Are you aware that Plaintiff was taken to the Emergency Room October 6, 2010 for injuries which occurred prior to and subsequent to her arrest for disorderly conduct while cheering for the Phillies at a playoff game?

25. Are you aware that a private citizen complaint was filed against Joe Oteri as soon as Plaintiff learned the name of the security guard who had seriously injured her by harassing, grabbing at her right arm, pulling at her then pushing her head into the stadium seat then lied to the police about it?

Date: July 8, 2016

By: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I Jo Ann Fonzone, Esquire aka Judy Mc Grath, hereby certify that I have on this days caused to be served a true and correct copy of the Interrogatories on the following defendant at the address as listed below:

Reger Rizzo& Darnell
Robert Foster, Esq.
2929 Arch St., 14th floor
Philadelphia, Pa 19104

Richard Strouse
Phillies organization
Philadelphia, Pa

BY: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

NO.5:12 CV-5726

VS.

CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Christine Mc Shea, nonparty to the above titled action is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time , 30 days and in the manner provided by the Federal rules, sworn answers to each of the following as Interrogatories to nonparty are depositions on written questions:

1. How long have you been a police officer?
2. How many years have you been employed by the Philadelphia police department?
3. How long have you been employed in the Internal Affairs department of the Philadelphia police department?
4. How long has John Evans been employed by the Internal Affairs department of the Philadelphia police department?
5. How long have you worked with John Evans at Internal Affairs and did you work with him prior to working with him at Internal Affairs?

9. Are your IA interviews ,whether in person or telephonically, ever recorded or are notes taken ?

10. Did Jo Ann Fonzone cooperate with the investigation of her IA complaint?

11. Was Jo Ann Fonzone questioned about any alias names and the circumstances surrounding that where she provided facts including illegal use of her ssn by her estranged spouse?

12. Did Ms. Fonzone provide names of family and friends, (including her mother and sister who were with her before she went to the game), former employer, bus company that transported her and an entire bus full of other fans to the playoff game, other witnessess including the police Sargeant who saw her injuries and had her taken to the Emergency Room, the ER doctor at the Janaury 28, 2011 interview and prior thereto on her IA complaint form with attachments?

13. Since Ms. Fonzone provided all of the above mentioned names to IA , why didnt Sargeant Evans contact or interview any of these witnesses in the course of this IA investigation?

14. Since Ms. Fonzone provided information about the injuries she sustained , and was an injured crime victim transported to the ER by the police, why wasnt this investigated?

15. Why was the hospital transport police report which evidenced that Jo Ann Fonzone was injured prior to arrest and taken to the ER by police hidden and withheld for almost two years from the defense?

16. As stated on the back of the form , Isn't it the IA department policy to send a copy of the IA complaint to the District Attorney;?

17. Why then , by whose authority and instruction wasnt a copy of Jo Ann Fonzone's IA complaint form with attachments including her Permanent Protection From Abuse Order against her estranged spouse Cary Woods aka David Lee Roth sent to the District Attorney?

18. Why was John Evans later substituted to investigate Jo Ann Fonzone's IA complaint after Sergeant Middleton had been assigned first?

19. Are you aware that Lieutenant Appleton and Sergeant Middleton both determined that Jo Ann Fonzone's IA complaint was "founded," and deemed valid, she was a confidential informant, and that those police reports were also hidden and withheld from defense for about three years, though the police and District attorney had these police reports since December 2010?
20. Do you think it was unimportant for this investigation of police misconduct to subpoena the 911 audio when Jo Ann Fonzone called for help from police custody as she was in fear for her life after being thrown against the wall the first time?
21. Do you think it was unimportant for investigators to subpoena videotape from outside at the stadium or interview any witnesses, like fans at the stadium, at the time of the incident between 5:45 and 6:00 p.m.?
22. Is the purpose of an IA investigation to get to the truth of the matter or rather to discredit the complainant especially when, as here, she was an injured crime victim of police brutality and false arrest? Why was there no questioning of Sergeant Addison or ER staff?
23. Was a thorough, complete, unbiased, impartial investigation conducted into Jo Ann Fonzone's complaint of police misconduct, then why did John Evans tell all the officers he interviewed that it was an investigation into the criminal case against Jo Ann Fonzone?
24. Why was John Evans more concerned with the condition of Jo Ann Fonzone's phone than he was about her physical injuries and condition, did he believe she had a camera phone too?

Date: July 13, 2016

By: _____
Jo Ann Fonzoen, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I Jo Ann Fonzone , Esquire aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories to nonparty or depositions on written questions upon the following at the address listed below:

Officer Christine Mc Shea
City of Philadelphia law department
Aaron Shotland, Esq.
1515 Arch St., 14 th floor
Philadelphia, Pa 19102

July 13, 2016

BY: _____

Jo Ann Fonzone, Esquire aka Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL , DEFENDANTS

Kevin Amerman, Christine Schiavo, non-parties to the above titled action, are requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal Rules, 30 days from the service , sworn answers to each of the following Interrogatories as written depositions: about Plaintiff.

1. State the names of all officers, employees or agents of the Tribune corporation who allegedly made, published and distributed allegedly libelous or defamatory statements about Plaintiff on May 9, 2010. for each such officer , employee or agent:

(a) Identify each specific act of conversation or other means of communication between reporter Ameramn and each and every person he contacted, including their name, address, employer, phone number, and questioned and talked to or met with about the May 9, 2010 subject article, and the date , place, method of communication, and content of each conversation with each of those that were contacted.

(b) Identify the name of the person from the previous interrogatory who told Amerman to contact Plaintiff and gave him the unlisted phone number , and the date, method of communication and content of that conversation.

2. What was the reason Amerman phoned Plaintiff Jo Ann Fonzone and what was the reason he wanted to write a front page article about her ?

3. State whether , when and where Amerman had conversations or other communications with any former lawyers of Plaintiff , and if so, state:

(a) the name and address of each person present , by phone or other mode of communication during each conversation or othe form of communication with Amerman and any former attorney named in the article and exact date, time , place, of conversations or other communications

(b) the address or other means of identification, of the place where conversations took place and the exact time, place of conversations or other communications:

4. How long have Christine Schiavo and Kevin Amerman been employees of the Tribune corporation?

(a) What was amerman's job title and job description when he became an employee of a Tribune corporation newspaper?

(b) What was Christine Schiavo's job title and job description when she became an employee of a Tribune corporation newspaper?

(c) Does Ms. Schiavo still have in her possession the cover letter and resume Plaintiff (where she described herself as an advocate for abused women)sent to her in 2008 in application for the Watchdog reporter position advertised in the Tribune corporation owned newspaper the Morning Call? (a copy of the letter was sent to Tribune legal counsel Bralow, Guernsey and publisher Ryan in 2010).

(d) How long has Tim Ryan been the publisher of the Tribune owned newspaper The Morning Call?

5. What is the current and previous relationship between Debbie Garlicky, the Lehigh County District attorney Right to Know officer and the previous right to know director Terry Melcher and the Tribune corporation owned newspaper The Morning Call?
6. What is the relationship between Christine Bonesch ,the Lehigh County Right to Know Appeals officer and the Tribune owned The Morning Call newspaper?
7. What was reporter Ameramn's purpose, intent motive and objective with the Tribune owned Morning Call front page article May 9, 2010, what was he attempting to accomplish or convey other than a complete character assassination of Jo Ann Fonzone an abuse survivor?

8.State whether Amerman, Schiavo and Ryan believed the statements about Plaintiff in the article were true based on information received through statements made by others, and if so, state:

(a) the name, or other means of identification, and address of each person from whom information was received on which Amerman relied upon , without reading fact checking, in making the written article about Plaintiff:

(b) the time, place, date each statement was made:

(c) the statements of what each person said or communicated, and

(d) the name and address of each person present in person or by phone or other mode of communication when each statement was made:

9. State whether you claim that the statements about Plaintiff in the article were true, based on opinion, reputation, gossip of Plaintiff's former lawyers or others, and if so, state the name or other means of identification, and address of each person who:

(a) expressed each opinion to you:

(b) has heard or repeated such unsubstantiated gossip or opinion:

10. State whether you claim that the statements made in the article about Plaintiff were a privileged response to a request for this information, and if so, state:

(a) the name and address of the person(s) who represented the information and/or the article to be published:

(b) the time, date, place where the opinion information was requested:

(c) the business or legal relationship between the person(s) requesting the information and the Plaintiff;

(d) the relationship, including any financial arrangement between Amerman and the person(s), or entity, bank, corporation, requesting the information and/or article to be published:

11. How and from whom did Amerman get Jo Ann Fonzone's unlisted phone number in 2009?

12. What ,who, when and where was Amerman prompted to first contact Jo Ann Fonzone "?

13. Are Amerman and Schiavo still employed by the Tribune owned The Morning Call newspaper?

14. Were Amerman and Schiavo disciplined, sanctioned or reprimanded in any way by their employer for their reckless and careless disregard for the truth and the health and safety of the subject of their libelous, inaccurate, untrue, false, inflammatory, intentionally damaging article May 9, 2010?

15. State any other facts on which you rely in support of the contention the publication of the May 9, 2010 article about the Plaintiff was privileged.

16. State the facts on which you rely to support your denial that the Plaintiff has suffered egregious damages as a result of the defamatory article on the front page of the Morning Call on May 9, 2010.

17. Identify any and all documents, individuals, and information that you relied on in making the determination to publish the article that appeared in the newspaper owned by defendant Tribune corporation on May 9, 2010 and which was aired on the many television and radio stations owned by the Tribune corporation; and which was transmitted worldwide on the Internet.

18. State whether at the time of the publication of the article, you were aware that Plaintiff's former attorneys Rahman and Zelechisky had attempted in the past to discredit and attack Plaintiff's character in their attempt to gain advantage in the legal malpractice action because they did not properly represent her as per the attorney-client written agreements .

19. State whether , at the time of the publication of the article of May 9, 2010 you failed to include certain material that cast substantial doubt in the accuracy and validity of the allegations made by Rahman and Zelechisky, including:

a. the fact that Plaintiff told defendant amerman that she was a victim of abuse, physical injuries and ID theft for decades, and the retaliation for trying to fight back legally worsened since she left California in 1993 and decided to get a divorce from Cary Woods .

b. why were these facts not included in the article;

c. what were the reasons for omitting these facts;

d. the name, address, and employment position of the person that made the decision to omit these facts;

20. State whether , prior to the publication of the article, you were advised as to the truthfulness and accuracy of the damaging statements made in the article about Plaintiff , and if so, state:

a. the name , address, employment position of each person who advised you;

b. the substance of that advice;

c. an account of what , if anything, you did pursuant to that advice;

21. State what, if any, research, due diligence, investigation was done prior to the publication of the article;

22. State the name, address, and employment position of each individual performing such research, investigation or due diligence;

23. State whether , if any, proofreading was done by defendants Schiavo, amerman's supervisor, or Mr. Ryan , the Morning Call publisher, or anyone ;

24. State all facts on which you rely to support your defense that your communications on the front page article of May 9, 2010, were made in good faith, without malice and to serve a legitimate business purpose; and please specify just exactly what legitimate business purpose is served by attacking an abuse victim.

25. State the names, addresses and roles or functions of all persons, firms, Corporations, newspapers, radio stations, TV stations, Internet providers, involved in any way in issuing and/or publication, dissemination, or republication of the article of May 9, 2010, its content in full or partial form;

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone, Esquire hereby certify that I have on this day caused to be served a true and correct copy of Interrogatories as written depositions on non-parties in this action to the following at the address listed below:

Caitlin Guerney, Esq.
Pepper Hamilton LLP
3000 18th & Arch Streets
Philadelphia, Pa 19103

July 22, 2016

By: _____

Jo Ann Fonzone, Esquire akak Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

5;12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Timothy Ryan, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal rules, 30 days from service, sworn answers to each of the following Interrogatories and written depositions:

1. How many years have you been employed by the Tribune Corporation , in what state are you domiciled for the last ten years ,and what is your current position with the media corporation?
2. How involved are you with the day to day publishing of Tribune owned The Morning Call newspaper and do you or any other Tribune employee proofread and fact check front page articles before they are printed?
3. State whether you have learned of additional facts or information (prior to subsequent to publication)regarding the subject matter of the May 9, 2010 front page The Morning Call article about Jo Ann Fonzzone that would bear on the truth or accuracy of the article, and if so, state:

(a) If the answer was yes to the preceding question, from whom, when, where, how, and why did you learn additional facts or information, who was the source(s) and what precisely were the contents of the information?

4. State the name and addresses of all persons having knowledge of discoverable matter in this case, and describe the substance of that knowledge.

5. In regard to all individuals contacted prior to the publication of the article regarding the subject matter of the article, state in detail for each individual the name and address of each individual contacted and the name and address of each individual who contacted the above individuals and the reasons they were contacted, the substance of the conversation, any agreements made, dates of contact, location of the communications and the manner of communication, (telephone, letter, fax, e-mail, in person, internet, etc.)

6. State whether you sought any advice of any lawyers regarding the possibility of becoming involved in libel and defamation litigation as a result of the May 9, 2010 The Morning Call article, and whether the article was sufficiently egregious to possibly incite strangers to act violently and disdainfully toward Jo Ann Fonzone.
7. State whether you have ever been a defendant in any lawsuit, and if you have ever been a defendant in an action for libel, slander, defamation, personal injury, if so, provide the case name, case citation, date, court location, and resolution of case.

8. State when and from whom defendants obtained permission to publish the photograph of Jo Ann Fonzone which appeared on the front page of The Morning Call newspaper May 9, 2010?

(a) the authority held by the person to give permission and authority to publish the photograph, and

(b) the manner in which permission and authority was obtained;

9. State the name and address of the person who obtained the photograph and from whom or where the photograph was obtained:

10. State the specific purpose for publishing the Plaintiff's photograph in the May 9, 2010 The Morning Call and, in doing so, identify:

(a) the name and address of those responsible for making the decision to publish the photograph:

(b) the title or employment position held by each person responsible; and

(c) the specific dates and responsibilities held by each person responsible:

11. State whether defendants ever attempted to warn or notify Jo Ann Fonzone that her photograph and the article about her would be published on the front page May 9, 2010, and if not, state each and every reason why the notification or warning was not given:

12. State each and every reason why the defendants did not attempt to obtain permission from the Plaintiff to publish the article and photograph in the Morning Call on May 9, 2010:

13. State the bases for the contention that the photograph and article published by the Morning Call on May 9, 2010 did not leave a false impression as to Plaintiff's reputation, character, integrity and was merely "unflattering", ;

14. State the number of Sunday edition Morning Call newspaper subscribers, including businesses and residences, colleges, hospitals, etc.:

15. State the estimated number of Internet users with access to the Morning Call and other Tribune corporation owned newspapers, blogs, emails, faxes, twitter, face book, skype, etc. on their computers and on public computers and computers at places of employment throughout the world:

16. State the estimated number of those individuals who listen to any of the Tribune corporation owned radio stations at home, in their vehicles, at work, at any public place etc.

17. State the number of individuals who watch any of the Tribune corporation TV stations throughout the world at home, at work, on their computer, or telephone device, or at a public place, etc.

18. State whether you made an attempt to retract any matter contained in the article, and, if so, state:

a. each media used to accomplish the retraction;

b. the name and date of each newspaper or TV or radio station in which any retraction appeared;

c. the number of column inches devoted the retraction;

d. whether any headline or boldface type identified the article as an apology or retraction;

e. the date and time of each retraction broadcast over either your television or radio networks;

f. the number of minutes devoted to any radio or television retraction;

g. the total number of network or affiliated stations or newspapers or Internet that carried any purported retraction; and

h. whether any videotape or other recording was made of any retraction, and, if so, the name and address of the person who has possession of the recording.

19. With respect to the article of May 9, 2010, state whether at anytime after its publication, Plaintiff requested that defendants retract or reprint with accurate facts the alleged defamatory article, state as to each request:

a. the date, time, and to whom such request was made:

b. mode of communication of the requests;

c. the names and addresses and employment position of the person or persons to whom the requests were communicated;

20. With respect to the preceding question, what was the reply of the Plaintiff's requests by phone to the Morning Call personnel, then by letter to publisher Mr. Ryan:

21. State whether any defendant or any non-party benefited or intended to benefit in any way from the publication of the May 9, 2010 front page article, and, if so, with respect to the article, state:

a. the name, address and employment position of the person or persons who benefited or anticipated any benefit from the article of May 9, 2010:

b. a detailed description of the benefit received or anticipated to receive indicating whether the benefit was actually received ;

23. Describe in detail each republication of the May 9, 2010 article referred to in the complaint, indicating as to each republication;

a. the date and time when said article was republished;

b. the location where any of the article was republished;

c. the name, address, and corporate name of everyone involved in the republication;

d. the mode of the republication;

23. State what defendant ameramn did with the notes he took at the meeting with Plaintiff in the Morning Call lobby in December 2009.

24. State whether defendant amerman knows what the words reckless disregard for the truth mean;

25. State your name, address, employment position, and authority by which you are answering these interrogatories:

Date:

07/20/16

Respectfully Submitted:

Jo Ann Fonzone, Esquire aka Judy McGrath

By: Jo Ann Fonzone, Esquire
Attorney For Plaintiff

Jo Ann Fonzone ESQUIRE
aka Judy McGrath

CERTIFICATE OF SERVICE

I, Jo Ann Fonzone, Esquire hereby certify that I have on this day caused to be served a true and correct copy of Interrogatories as written depositions on non-parties in this action to the following at the address listed below:

Caitlin Guerney, Esq.
Pepper Hamilton LLP
3000 18th & Arch Streets
Philadelphia, Pa 19103

July 22, 2016

By: _____

Jo Ann Fonzone, Esquire akak Judy Mc Grath

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

NO.5:12-CV-5726
JURY TRIAL DEMANDED
CIVIL ACTION

Clair Wischusen, non-party to the above titled action is requested to file with this court and serve upon counsel for Plaintiff, within the time and in the manner provided by the Federal rules, 30 days from service, sworn answers to each of the following Interrogatories as written depositions:

1. Were you opposing counsel in prior civil litigation with Plaintiff Jo Ann Fonzone?
2. What was the nature and caption of said litigation?
3. What defendants did you and your firm represent in that prior litigation?
5. What were the dates that the prior action was active and what was the resolution or disposition of the action?

6. At what stage of litigation and at where ,when, how and why did the litigation end?
7. Did Plaintiff have an opportunity to obtain any Discovery from defendants in the prior action?
8. Did Plaintiff serve any discovery, specifically Interrogatories upon defendants, and if so, what was the date of service?
9. Did defendants provide any answers to Plaintiff's Interrogatories, and if not, why not?

12. Please explain the circumstances surrounding the initiation of the civil action against the defendants that you represented and the date the case began in the Common Pleas Court.

13. Do you recall a subpoena in this action for bank records from Plaintiff to Chase Bank, and if so, was the date on the subpoena October 6?

14. Please provide all the names in the caption of the action # 2010-C-5208.

15. Did you represent defendant Chase Bank in the action ?

16. Please provide the name of counsel for Chase Bank and state if they were present September 27, 2011 at the Argument ?

17. Do you believe that the Plaintiff received full and fair adjudication of her personal injury ID theft action on the merits when her case was dismissed ex parte September 27, 2011?

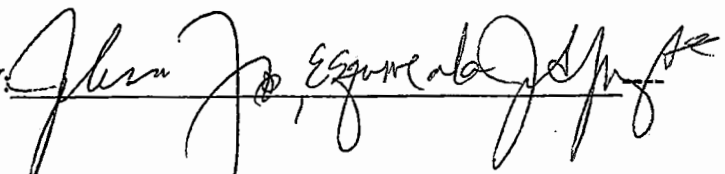
18. Do you believe that legal causes of action , particularly personal injury actions, should be decided on their merits or dismissed by the parties who have more financial resources prior to any consideration of the merits?

19. Do you believe that there is an epidemic of violence against women in this country which is hidden and concealed for the most part by those who gain advantage in so doing?

20. Did you or anyone in your firm do any investigative work or communicate with anyone about Plaintiff or this lawsuit during the course of the litigation or prior thereto or subsequently?

21. If the answer to the above question was yes, please provide details of any investigation and communications including names, dates, places, mode of communication.

August 3, 2016

BY: 
Jo Ann Fonzzone , Esquire aka Judy Mc Grath



Fox Rothschild LLP
ATTORNEYS AT LAW

Stone Manor Corporate Center
2700 Kelly Road, Suite 300
Warrington, PA 18976-3624
Tel 215.345.7500 · Fax 215.345.7507
www.foxrothschild.com

Clair E. Wischusen
Direct Dial: (215) 918-3559
Email Address: cwischusen@foxrothschild.com

VIA FIRST CLASS MAIL

September 15, 2011

JoAnn Fonzone, Esquire
2242 W. Tilghman Street, Apt. C1
Allentown, PA 18104

Re: Fonzone v. Chase Manhattan Bank, et al.

Dear Ms. Fonzone:

I received a set of documents from you by package dated September 6, 2011. The documents were unnumbered, and many of the documents appeared to be originals marked with ink. For your records, enclosed please find copies of the documents I received from you, which have been bates-stamped FON0001 – FON0095.

Very truly yours,

Clair E. Wischusen

CW:cew
Enclosures

CERTIFICATE OF SERVICE

I Jo Ann Fonzone, Esquire aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories as written depositions upon the following non-party to this action by U. S. Mail at the address listed below:

Clair Wischusen, Esq.
Fox Rothschild LLP
2700 Kelly Road, suite 300
Warrington, Pa 18976

August 3, 2016

BY: 

Jo Ann Fonzoen, Esquire aka Judy Mc Grath

CERTIFICATE OF SERVICE

I Jo Ann Fonzone, Esq. aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Petition For Clarification upon the following at the addresses listed below:

Aaron Shotland ,Esq. - Representiative and accepting service for parties and non-parties of the City of Philadelphia
City of Philadelphia law dept. Persons listed : 1-14, 16,22,34,36,
1515 Arch St., 14th floor
Philadelphia, Pa 19102

Robert Foster, Esq. - Representative and accepting service for those listed : 15, 24, 35
Roger Rizzo & Darnell,LLP
2929 Arch St.
Phila., Pa 19104

Richard Patton, Esq.
1223 Locust St.
Philadelphia,Pa
19107

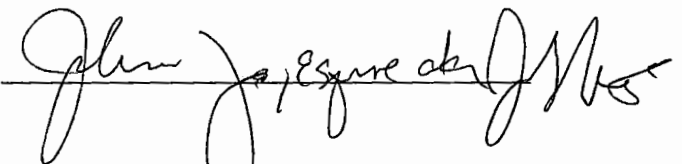
Defender Associates 31-33
1441 Sansom St.
Philadelphia, Pa 19107

Philadelphia District Attorney
Representing 27-30
3 S. Penn Square
Phila., Pa 19107

Dated: Nov. 30, 2016

Feb. 16, 2018

By:



Jo Ann Fonzone, Esquire aka Judy Mc Grath